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*Special Conflicts Counsel to the Official Committee of
Unsecured Creditors of Sears Holdings Corporation, et al.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
In re: : Chapter 11
: :
SEARS HOLDINGS CORPORATION, *et al.*, : Case No. 18-23538 (RDD)
: :
: (Jointly Administered)
Debtors.¹ :
----- X

**SUMMARY SHEET FOR FINAL APPLICATION FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES BY
MORITT HOCK & HAMROFF LLP AS SPECIAL CONFLICTS COUNSEL TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
THE PERIOD OF JANUARY 2, 2020 THROUGH SEPTEMBER 30, 2021**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

General Information	
Name of Applicant:	Moritt Hock & Hamroff LLP (" <u>Moritt Hock</u> ") ²
Authorized to Provide Professional Services to:	The Official Committee of Unsecured Creditors and the Litigation Designees
Petition Date:	October 15, 2018
Date of Retention:	April 30, 2020, <i>nunc pro tunc</i> to January 2, 2020

Summary of Fees and Expenses Sought in this Final Fee Application	
Period Covered by this Application:	January 2, 2020 through and including September 30, 2021 (the " <u>Compensation Period</u> ")
Amount of Compensation Sought as Actual, Reasonable and Necessary for the Compensation Period:	\$536,618.00
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary for the Compensation Period:	\$12,031.22
Total Compensation and Expenses Requested for the Compensation Period:	\$548,649.22
Amount Previously Paid:	\$530,758.32
Net Amount Due:	\$17,890.90

This is a: ☐ Monthly ☐ Interim ☒ Final Application

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Order (I) Confirming Modified Second Amended Joint Chapter 11 Plan of Sears Holdings Corporation and its Affiliated Debtors and (II) Granting related Relief, dated October 15, 2019 [ECF No. 5370] (the "Confirmation Order") or the Modified Second Amended Joint Chapter 11 Plan of Sears Holdings Corporation and its Affiliated Debtors, dated October 15, 2019 [ECF No. 5370-1] (the "Plan"), as applicable.

**SUMMARY OF MONTHLY FEE STATEMENTS
AND CORRESPONDING FEE APPLICATIONS FILED**

PERIOD COVERED	FEES INCURRED/ALLOWED	EXPENSES INCURRED/ALLOWED	FEES APPROVED AND PAID	EXPENSES APPROVED AND PAID
01/02/20-03/31/20 [Dkt. 7942]	\$54,306.80 (80% of \$67,883.50)	\$6,105.76	\$54,306.80	\$6,105.76
04/01/20-04/30/20 [Dkt. 7999]	\$55,006.40 (80% of \$68,758.00)	\$617.77	\$55,006.40	\$617.77
05/01/20-05/31/20 [Dkt. 8056]	\$41,907.60 (80% of \$52,384.50)	\$906.00	\$41,907.60	\$906.00
06/01/20-06/30/20 [Dkt. 8310]	\$21,321.20 (80% of \$26,651.50)	\$325.00	\$21,321.20	\$325.00
First Interim Fee Application 01/02/20-06/30/20 [Dkt. 8375]	\$215,677.50	\$7,954.53		
First Interim Fee Order [Dkt. 9009]			\$215,677.50	\$7,954.53
07/01/20-07/31/20 [Dkt. 8395]	\$36,031.20 (80% of \$45,039.00)	\$129.60	\$36,031.20	\$129.60
08/01/20-08/31/20 [Dkt. 8430]	\$34,748.40 (80% of \$43,435.50)	\$3,131.60	\$34,748.40	\$3,131.60
09/01/20-09/30/20 [Dkt. 9027]	\$115,993.60 (80% of \$144,992.00)	\$187.20	\$115,993.60	\$187.20
10/01/20-10/31/20 [Dkt. 9096]	\$31,923.60 (80% of \$39,904.50)	\$117.81	\$31,923.60	\$117.81
Second Interim Fee Application 07/01/20-10/31/20 [Dkt. 9182]	\$273,371.00	\$3,566.21		
Second Interim Fee Order [Dkt. 9312]			\$273,371.00	\$3,566.21
11/1/20-12/31/20 [Dkt. 9266]	\$15,347.60 (80% of \$19,184.50)	\$233.08	\$15,347.60	\$233.08
01/01/21-01/31/21 [Dkt. 9294]	\$3,377.17 (80% of \$4,221.50)	\$200.00	\$3,377.17	\$200.00
02/01/21-02/28/21 [Dkt. 9370]	\$5,024.00 (80% of \$6,280.00)	\$70.00	\$5,024.00	\$70.00
Third Interim Fee Application	\$29,686.00	\$503.08		

PERIOD COVERED	FEES INCURRED/ALLOWED	EXPENSES INCURRED/ALLOWED	FEES APPROVED AND PAID	EXPENSES APPROVED AND PAID
11/01/20-02/28/21 [Dkt. 9408]				
Third Interim Fee Order [Dkt. 9545]			\$29,686.00	\$503.08
03/01/21-09/30/21 [Dkt. 9989]	\$14,306.80 (80% of \$17,883.50)	\$7.40	\$14,306.80	\$7.40
Fourth Interim Fee Application 03/01/21-09/30/21 [Dkt. 10217]	\$17,883.50	\$7.40		
Fourth Interim Fee Order ³				
TOTAL	\$536,618.00	\$12,031.22		

³ As of the date of this application a Fourth Interim Fee Order has not been entered by the Court.

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*Special Conflicts Counsel to the Official Committee of
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**UNITED STATES BANKRUPTCY COURT
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In re:	: Chapter 11
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SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	: Case No. 18-23538 (RDD)
	:
Debtors ¹ .	: (Jointly Administered)
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**FINAL APPLICATION FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES BY MORITT HOCK & HAMROFF LLP
AS SPECIAL CONFLICTS COUNSEL TO THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS FOR THE PERIOD OF
JANUARY 2, 2020 THROUGH SEPTEMBER 30, 2021**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

Moritt Hock & Hamroff LLP (“Moritt Hock”), special conflicts counsel to the Official Committee of Unsecured Creditors (the “Creditors’ Committee”) appointed in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) of Sears Holding Corporation and its affiliated debtors and debtors in possession (collectively, the “Debtors”), hereby respectfully submits its final fee application (the “Final Fee Application”) and respectfully states as follows:

PRELIMINARY STATEMENT

1. Moritt Hock requests pursuant to sections 330(a) and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 2016-1 of the Local Bankruptcy Rules for the Southern District of New York (the “Local Bankruptcy Rules”), (a) allowance on a final basis of compensation for professional services rendered by Moritt Hock in the amount of \$536,618.00 and reimbursement of actual and necessary expenses incurred by Moritt Hock in the amount of \$12,031.22 for the period from January 2, 2020 through and including September 30, 2021 (the “Total Compensation Period”) and (b) payment of a balance of \$17,890.90, which consists of (i) 100% of the fees totaling \$17,883.50 requested in the Twelfth Monthly Fee Statement and Fourth Interim Fee Application and (ii) \$7.40 for expenses requested, but not yet paid, pursuant to the Twelfth Monthly Fee Statement and Fourth Interim Fee Application.

2. This Application has been prepared in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, the Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [ECF No. 796] (the “Interim Compensation Order”), the Order Authorizing Appointment of Independent Fee Examiner Pursuant to 11 U.S.C. § 327, dated April 22, 2019 [ECF No. 3307] (the “Fee Examiner Order”), the Amended Guidelines for Fees and Disbursements for Professionals in the

Southern District of New York (June 17, 2013) promulgated pursuant to Local Bankruptcy Rule 2016-1(a) (the “Local Guidelines”) and the United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases, effective as of November 1, 2013 (the “U.S. Trustee Guidelines”) and, together with the Local Guidelines, the “Fee Guidelines”). Pursuant to the Local Guidelines, a certification regarding compliance with the Fee Guidelines and Interim Compensation Order is annexed hereto as Exhibit A.

JURISDICTION AND VENUE

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

4. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The statutory bases for the relief requested herein are Bankruptcy Code sections 330 and 331, Bankruptcy Rule 2016 and Local Bankruptcy Rule 2016-1.

BACKGROUND

A. The Debtors’ Chapter 11 Cases

6. On October 15, 2018 (the “Petition Date”), and continuing thereafter, each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors continue to operate their businesses as debtors in possession pursuant to Bankruptcy Code sections 1107(a) and 1108. The Chapter 11 Cases are jointly administered for procedural purposes only. No trustee or examiner has been appointed in the Chapter 11 Cases.

7. On October 24, 2018 (the “Formation Date”), the Office of the United States Trustee for Region 2 (the “U.S. Trustee”) appointed the Creditors’ Committee pursuant to Bankruptcy Code section 1102(a). Notice of Appointment of Official Committee of Unsecured

Creditors [ECF No. 276]. The Creditors' Committee currently comprises eight members.² Simon Property Group, L.P. serves as chair of the Creditors' Committee (the "Chair").

8. On January 3, 2019, the U.S. Trustee filed the Motion of United States Trustee for Order Authorizing Appointment of Independent Fee Examiner [ECF No. 1490]. On April 22, 2019, this Court entered the Fee Examiner Order [ECF No. 3307]. On the same day, Paul E. Harner was appointed as fee examiner in the Chapter 11 Cases (the "Fee Examiner"). The Fee Examiner has retained Ballard Spahr LLP as legal counsel.

B. The Jointly Asserted Causes of Action

9. Pursuant to the Confirmation Order, the Court granted the Creditors' Committee joint standing with the Debtors and authorized it to investigate, commence, prosecute, settle and otherwise dispose of certain claims and causes of action (collectively, "Jointly Asserted Causes of Action") jointly with the Debtors for the benefit of the Debtors' estates and creditors in accordance with the terms of the Plan. The Jointly Asserted Causes of Action are overseen by designees who will be the initial members of the Liquidation Trust Board upon consummation of the Plan (such members, the "Litigation Designees").³

10. Due to certain potential conflict issues, the Creditors' Committee selected Moritt Hock to serve as special conflicts counsel with respect to matters pertaining to the Jointly Asserted Causes of Action.

² The following entities currently comprise the Creditors' Committee: (i) The Bank of New York Mellon Trust Company, N.A., as Indenture Trustee; (ii) Brixmor Operating Partnership, L.P.; (iii) Computershare Trust Company, N.A.; (iv) Oswaldo Cruz; (v) Pension Benefit Guaranty Corporation ("PBG"); (vi) Simon Property Group, L.P.; and (vii) Winiadaewoo Electronics America, Inc. *See Amended Notice of Appointment of Official Committee of Unsecured Creditors*, dated March 31, 2020 [ECF No. 7539].

³ The initial members of the Liquidating Trust Board will be: (i) Patrick Bartels; (ii) Alan Carr; (iii) Eugene Davis; (iv) William Transier; and (v) Raphael Wallander.

C. Retention of Moritt Hock as Special Litigation Counsel

11. On January 2, 2020, the Creditors' Committee selected Moritt Hock as its special conflicts counsel in connection with the Chapter 11 Cases (the "Chapter 11 Cases") in order to investigate the transactions underlying the Jointly Asserted Causes of Action. On April 9, 2020, the Creditors' Committee filed its application to retain and employ Moritt Hock as its special conflicts counsel [ECF No. 7798] (the "Moritt Hock Retention Application"), which application was authorized by an order of this Court dated April 30, 2020 [ECF No. 7884] (the "Moritt Hock Retention Order").

12. The Moritt Hock Retention Order authorizes the Creditors' Committee to retain and employ Moritt Hock in accordance with Moritt Hock's normal hourly rates and disbursement policies, *nunc pro tunc* to January 2, 2020, all as contemplated by the Moritt Hock Retention Application. Specifically, the Moritt Hock Retention Order authorizes Moritt Hock to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

D. Allowance of Prior Fee Applications

13. On August 14, 2020, Moritt Hock filed the *First Interim Fee Application of Moritt Hock & Hamroff LLP as Special Conflicts Counsel to the Official Committee of Unsecured Creditors for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period of January 2, 2020 through June 30, 2020* (the "First Interim Fee Application"), seeking interim allowance of \$215,677.50 in compensation for fees for professional services rendered and \$7,954.53 in reimbursement for expenses incurred during the period of January 2, 2020 through and including June 30, 2020 (the "First Interim Compensation Period"). On October 15, 2020, the Court entered the *Fifth Order Granting Applications of*

Professionals for Allowance of Compensation and Reimbursement of Expenses [Docket No. 9009], granting allowance of \$215,677.50 in fees and \$7,954.53 in expenses to Moritt Hock.

14. On December 15, 2020, Moritt Hock filed the *Second Interim Fee Application of Moritt Hock & Hamroff LLP as Special Conflicts Counsel to the Official Committee of Unsecured Creditors for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period of July 1, 2020 through October 31, 2020* (the “Second Interim Fee Application”), seeking allowance of \$273,371.00 in compensation for fees for professional services rendered and \$3,566.21 in reimbursement for expenses incurred during the period of July 1, 2020 through and including October 31, 2020 (the “Second Interim Compensation Period”). On February 23, 2021, the Court entered the *Sixth Order Granting Applications of Professionals for Interim Allowance of Compensation and Reimbursement of Expenses* [Docket No. 9312], granting allowance of \$273,371.00 in fees and \$3,566.21 in expenses to Moritt Hock.

15. On April 14, 2021, Moritt Hock filed the *Third Interim Fee Application of Moritt Hock & Hamroff LLP as Special Conflicts Counsel to the Official Committee of Unsecured Creditors for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period of November 1, 2020 through February 28, 2021* (the “Third Interim Fee Application”), seeking allowance of \$29,686.00 in compensation for fees for professional services rendered and \$503.08 in reimbursement for expenses incurred during the period of November 1, 2020 through February 28, 2021 (the “Third Interim Compensation Period”). On June 2, 2021, the Court entered the *Seventh Order Granting Applications of Professionals for Interim Allowance of Compensation and Reimbursement of Expenses* [Docket No. 9545], granting allowance of \$29,686.00 in fees and \$503.08 in expenses to Moritt Hock.

16. On January 7, 2022, Moritt Hock filed the *Fourth Interim Fee Application of Moritt Hock & Hamroff LLP as Special Conflicts Counsel to the Official Committee of Unsecured Creditors for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period of March 1, 2021 through September 30, 2021* (the “Fourth Interim Fee Application”), seeking allowance of \$17,883.50 in compensation for fees for professional services rendered and \$7.40 in reimbursement for expenses incurred during the period of March 1, 2021 through September 30, 2021 (the “Fourth Interim Compensation Period”). As of the date of this filing the Court has not entered an Order on the Fourth Interim Compensation Period.⁴

17. Except as requested and paid pursuant to terms of the Interim Compensation Order, Moritt Hock has received no payment and no promises for payment from any source for services rendered in connection with the Chapter 11 Cases. There is no agreement or understanding between Moritt Hock and any other person for the sharing of compensation for the services rendered in the Chapter 11 Cases. The fees charged by Moritt Hock in the Chapter 11 Cases are billed in accordance with its existing billing rates and procedures in effect since entry of the Retention Order. The rates Moritt Hock charges for the services rendered by its professionals and paraprofessionals in the Chapter 11 Cases are the same rates Moritt Hock charges for professional and paraprofessional services rendered in comparable bankruptcy and non-bankruptcy related matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable cases in a competitive national legal market.

⁴ The hearing to consider the Fourth Interim Fee Application was initially noticed on April 26, 2022 [ECF Dkt. 10411] for hearing on May 26, 2022, however, such hearing has been adjourned from time to time. The hearing to consider approval of the Fourth Interim Fee Application is scheduled to occur simultaneous with the hearing on this Final Fee Application.

**SUMMARY OF PROFESSIONAL COMPENSATION
AND REIMBURSEMENT OF EXPENSES REQUESTED**

18. By this Final Fee Application, Moritt Hock requests (a) allowance on a final basis of compensation for professional services rendered by Moritt Hock the amount of **\$536,618.00** and reimbursement of actual and necessary expenses incurred by Moritt Hock in the amount of **\$12,031.22** for the Total Compensation Period and (b) payment of a balance of **\$17,890.90** which consists of 100% of the fees and expenses requested, but not yet paid, pursuant to the Twelfth Monthly Fee Statement and Fourth Interim Fee Application. During the Compensation Period, Moritt Hock attorneys and paraprofessionals expended a total of **1,317.20 hours** for which compensation is sought.

19. In accordance with the Interim Compensation Order, Moritt Hock filed and served the monthly fee statements (the “Monthly Fee Statements”) upon the required notice parties, as identified in the Interim Compensation Order, during the Total Compensation Period. The Committee has approved the amounts requested by Moritt Hock for services performed and expenses incurred in each of the Monthly Fee Statements (as defined below) filed pursuant to the Interim Compensation Order during the Total Compensation Period. Set forth below is a table of all of the monthly fee statements filed and the corresponding interim fee applications.

**TABLE 1
SUMMARY OF MONTHLY FEE STATEMENTS
AND CORRESPONDING FEE APPLICATIONS FILED**

PERIOD COVERED	FEES INCURRED/ALLOWED	EXPENSES INCURRED/ALLOWED	FEES APPROVED AND PAID	EXPENSES APPROVED AND PAID
01/02/20 –03/31/20 [Dkt. 7942]	\$54,306.80 (80% of \$67,883.50)	\$6,105.76	\$54,306.80	\$6,105.76
04/01/20-04/30/20 [Dkt. 7999]	\$55,006.40 (80% of \$68,758.00)	\$617.77	\$55,006.40	\$617.77
05/01/20-05/31/20 [Dkt. 8056]	\$41,907.60 (80% of \$52,384.50)	\$906.00	\$41,907.60	\$906.00

PERIOD COVERED	FEES INCURRED/ALLOWED	EXPENSES INCURRED/ALLOWED	FEES APPROVED AND PAID	EXPENSES APPROVED AND PAID
06/01/20-06/30/20 [Dkt. 8310]	\$21,321.20 (80% of \$26,651.50)	\$325.00	\$21,321.20	\$325.00
First Interim Fee Application 01/02/20-06/30/20 [Dkt. 8375]	\$215,677.50	\$7,954.53		
First Interim Fee Order [Dkt. 9009]			\$215,677.50	\$7,954.53
07/01/20-07/31/20 [Dkt. 8395]	\$36,031.20 (80% of \$45,039.00)	\$129.60	\$36,031.20	\$129.60
08/01/20-08/31/20 [Dkt. 8430]	\$34,748.40 (80% of \$43,435.50)	\$3,131.60	\$34,748.40	\$3,131.60
09/01/20-09/30/20 [Dkt. 9027]	\$115,993.60 (80% of \$144,992.00)	\$187.20	\$115,993.60	\$187.20
10/01/20-10/31/20 [Dkt. 9096]	\$31,923.60 (80% of \$39,904.50)	\$117.81	\$31,923.60	\$117.81
Second Interim Fee Application 07/01/20-10/6/32/20 [Dkt. 9182]	\$273,371.00	\$3,566.21		
Second Interim Fee Order [Dkt. 9312]			\$273,371.00	\$3,566.21
11/1/20-12/31/20 [Dkt. 9266]	\$15,347.60 (80% of \$19,184.50)	\$233.08	\$15,347.60	\$233.08
01/01/21-01/31/21 [Dkt. 9294]	\$3,377.17 (80% of \$4,221.50)	\$200.00	\$3,377.17	\$200.00
02/01/21-02/28/21 [Dkt. 9370]	\$5,024.00 (80% of \$6,280.00)	\$70.00	\$5,024.00	\$70.00
Third Interim Fee Application 11/01/20-02/28/21 [Dkt. 9408]	\$29,686.00	\$503.08		
Third Interim Fee Order [Dkt. 9545]			\$29,686.00	\$503.08
03/01/21-09/30/21 [Dkt. 9989]	\$14,306.80 (80% of \$17,883.50)	\$7.40	\$14,306.80	\$7.40
Fourth Interim Fee Application	\$17,883.50	\$7.40		

PERIOD COVERED	FEES INCURRED/ALLOWED	EXPENSES INCURRED/ALLOWED	FEES APPROVED AND PAID	EXPENSES APPROVED AND PAID
03/01/21-09/30/21 [Dkt. 10217]				
Fourth Interim Fee Order ⁵				
TOTAL	\$536,618.00	\$12,031.22		

20. The fees charged by Moritt Hock in these cases are billed in accordance with its existing billing rates and procedures in effect during the Total Compensation Period. The rates Moritt Hock charges for the services rendered by its professionals and paraprofessionals in these chapter 11 cases are the same rates Moritt Hock charges for professional and paraprofessional services rendered in comparable non-bankruptcy related matters. Such fees are reasonable based on the customary compensation charged by comparably skilled practitioners in comparable non-bankruptcy cases in a competitive national legal market. The disclosures required by the UST Guidelines regarding the customary and comparable compensation are annexed hereto as **Exhibit B**.

21. Moritt Hock maintains computerized records of the time spent by all Moritt Hock attorneys and paraprofessionals in connection with its representation of the Committee. A summary of compensation by timekeeper for the Total Compensation Period is attached hereto in **Exhibit C** and a summary of fees by task code for the Total Compensation Period is attached hereto in **Exhibit D**. A compilation of the itemized time records for Moritt Hock professionals and paraprofessionals performing services for the Committee, which have been filed and served upon the notice parties in accordance with the Interim Compensation Order, is attached hereto as **Exhibit E**. All entries itemized in Moritt Hock's time records comply with the requirements set

⁵ As of the date of this application a Fourth Interim Fee Order has not been entered by the Court.

forth in the Guidelines, including the use of separate matter numbers for different project types, as described in more detail below.

22. Moritt Hock also maintains records of all actual and necessary out-of-pocket expenses incurred in connection with the rendition of its professional services. A schedule of the categories of expenses and amounts for which reimbursement is requested for the Total Compensation Period is attached hereto as **Exhibit F** and a detailed itemization of expenses incurred is provided in **Exhibit G**. All entries itemized in Moritt Hock's expense records comply with the requirements set forth in the Guidelines.

**SUMMARY OF SERVICES PERFORMED
BY MORITT HOCK DURING THE
TOTAL COMPENSATION PERIOD**

23. The following is a summary of the professional services rendered by Moritt Hock during the Total Compensation Period. This summary is organized in accordance with the ABA Bankruptcy Code Set, commonly used in bankruptcy matters. In classifying services into task codes, Moritt Hock attempted to place the services performed in the category that most closely related to the services provided. The below does not include summaries for certain task codes for which a *de minimis* amount of time was billed during the Total Compensation Period.

24. Moreover, the following summary of services rendered during the Total Compensation Period is not intended to be a detailed description of the work performed. Rather, it merely is an attempt to highlight certain of those areas in which services were rendered to the Creditors' Committee and the Litigation Designees, as well as to identify some of the matters and issues that Moritt Hock was required to address during the Compensation Period.

B110 - CASE ADMINISTRATION

Total Hours	Fees
68.10	\$34,068.00

25. This category includes time spent by Moritt Hock professionals and paraprofessionals performing various administrative services in order to represent the Creditors' Committee and the Litigation Designees effectively and efficiently, including, among other things, (i) reviewing and analyzing pleadings and other documents filed by the Debtors and third parties relating to the 2004 investigation and the Jointly Asserted Causes of Action; (ii) apprising Moritt Hock attorneys and paraprofessionals of recent filings and upcoming deadlines; (iii) preparing internal task lists and case calendars; and (iv) communicating with Akin Gump, primary counsel to the Creditors' Committee and the Litigation Designees.

26. Moritt Hock professionals and paraprofessionals also monitored the dockets for the Chapter 11 Cases and the adversary proceeding captioned *Sears Holdings Corp. v Lampert*, Adv. Pro. 19-08250 (RDD) (Bankr. S.D.N.Y.) (the "Adversary Proceeding") to remain apprised of all critical matters. For each significant filing, Moritt Hock professionals and paraprofessionals worked to ensure that the appropriate parties were notified of its contents, relevant response deadlines, hearing dates and any other critical matters related thereto.

27. Moritt Hock believes it was able to address all case management issues in connection with matters within the scope of its engagement in an effective and efficient manner.

B160 - FEE/EMPLOYMENT APPLICATIONS

Total Hours	Fees
327.40	\$145,244.50

28. This category includes the time spent by Moritt Hock professionals and paraprofessionals preparing and drafting, *inter alia*: (a) the Monthly Fee Statements; and (b) the Interim Fee Applications.

29. Pursuant to the Interim Compensation Order, each of the Monthly Fee Statements contained a list of individuals who rendered services to the Creditors' Committee during the relevant compensation period, information as to each individual's title, billing rate and hours worked and a comprehensive breakdown of the fees incurred and disbursements expended. To minimize costs in connection with this time-intensive process, Moritt Hock relied on paraprofessionals to prepare the initial drafts of the Monthly Fee Statements, thereby limiting the time spent by attorneys on the review of fees, where reasonably practicable.

30. Moritt Hock professionals and paraprofessionals have also communicated with, and responded to numerous requests from, representatives from M-III Partners respecting, among other things, weekly accrual information.

B120 – ASSET ANALYSIS AND RECOVERY

Total Hours	Fees
819	\$309,891.50

31. This category includes time spent by Moritt Hock professionals and paraprofessionals in connection with their role as Special Conflicts Counsel to the Creditors' Committee and the Litigation Designees, pursuant to the Moritt Hock Retention Order. Through this role, Moritt is, among other things, conducting the investigation of certain transactions underlying the Jointly Asserted Causes of Action.

32. Specifically, Moritt Hock professionals and paraprofessionals, among other things: (i) reviewed relevant pleadings and underlying facts relating to the Jointly Asserted Causes of Action; (ii) served subpoenas for the production of documents in connection with prosecution of the Jointly Asserted Causes of Action; (iii) engaged in numerous meet and confers with counsel for certain of the subpoenaed parties regarding the subpoenas, including but not limited to international service issues, (iv) conducted related legal research; (v) resolved discovery disputes related to the scope of the document requests; (vi) reviewed and analyzed materials produced in response to subpoenas, and (vii) prepared materials for presentation to main counsel, the Creditors' Committee and the Litigation Designees.

B191 – LITIGATION/ADVERSARY PROCEEDINGS

Total Hours	Fees
104.40	\$47,414.00

33. This category includes time spent by Moritt Hock professionals and paraprofessionals in connection with their role as Special Conflicts Counsel to the Creditors' Committee and the Litigation Designees, pursuant to the Moritt Hock Retention Order. Through this role, Moritt is, among other things, conducting the investigation of certain transactions underlying the Jointly Asserted Causes of Action.

ACTUAL AND NECESSARY DISBURSEMENTS

34. As set forth in **Exhibit F** Moritt Hock seeks allowance of reimbursement of expenses in the amount of \$12,031.22 for expenses incurred during the Total Compensation Period in the course of providing professional services to the Creditors' Committee. Moritt Hock's disbursement policies pass through all out-of-pocket expenses at actual cost or an estimated actual cost when the actual cost is difficult to determine. For example, as it relates to

computerized research, Moritt Hock believes that it does not make a profit on that service as a whole although the cost of any particular search is difficult to ascertain. Other reimbursable expenses (whether the service is performed by Moritt Hock in-house or through a third-party vendor) include, but are not limited to, long-distance calls, overtime meals, deliveries, discovery, telephonic court appearances and travel.

FACTORS TO BE CONSIDERED IN AWARDING ATTORNEYS' FEES

35. Bankruptcy Code section 330 provides, in relevant part, that the Court may award to a professional person "reasonable compensation for actual, necessary services rendered[.]" See 11 U.S.C. § 330(a)(1). In turn, Bankruptcy Code section 330 provides as follows:

In determining the amount of reasonable compensation to be awarded, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonably based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

36. The clear congressional intent and policy expressed in Bankruptcy Code section 330 is to provide for adequate compensation in order to continue to attract qualified and competent bankruptcy practitioners to bankruptcy cases. *In re Drexel Burnham Lambert Grp., Inc.*, 133 B.R. 13, 20 (Bankr. S.D.N.Y. 1991) (“Congress’ objective in requiring that the market, not the Court, establish attorneys’ rates was to ensure that bankruptcy cases were staffed by appropriate legal specialists.”); *In re Busy Beaver Bldg. Ctrs., Inc.*, 19 F.3d 833, 850 (3d Cir.1994) (citations and internal quotations omitted) (“Congress rather clearly intended to provide sufficient economic incentive to lure competent bankruptcy specialists to practice in the bankruptcy courts.”).

37. In assessing the “reasonableness” of the fees requested, the Second Circuit has stated that courts should consider the factors enumerated in *Johnson v. Ga. Highway Express, Inc.*, while also incorporating the “lodestar method.” See *Arbor Hill Concerned Citizens Neighborhood Ass’n v. County of Albany and Albany County Bd. of Elections*, 522 F.3d 182, 190 (2d Cir. 2007) (citing *Johnson v. Ga. Highway Express, Inc.*, 488 F.2d 714 (5th Cir.1974), *abrogated on other grounds by Blanchard v. Bergeron*, 489 U.S. 87, 92-93, 96 (1989)). The “lodestar method” of calculating the reasonable fee contemplates “the number of hours reasonably expended . . . multiplied by a reasonable hourly rate.” See *Hensley v. Eckerhart et al.*, 461 U.S. 424, 433 (1983); *Gisbrecht v. Barnhart*, 535 U.S. 789, 801 (2002); *Perdue v. Kenny A.*, 130 S.Ct. 1662, 1672 (2010); *In re Drexel Burnham Lambert Grp., Inc.* 133 B.R. 13 (Bankr. S.D. N.Y. 1991). The factors set forth in *Johnson* and *In re First Colonial Corp. of Am.*, 544 F.2d 1291, 1298-99 (5th Cir. 1977) have been adopted by most courts.⁶ See *In re Nine Assocs., Inc.*, 76 B.R. 943, 945

⁶ The factors articulated by the Fifth Circuit in *First Colonial* were first articulated by the Fifth Circuit in *Johnson*, with the *First Colonial* out adding the factor of the “spirit of economy,” which was later rejected by Congress. See *Stroock & Stroock & Lavan v. Hillsborough Holdings Corp. (In re Hillsborough Holdings Corp.)*, 127 F.3d 1398, 1403 (11th Cir. 1997).

(S.D.N.Y. 1987) (adopting *First Colonial/Johnson* analysis); *In re Cuisine Magazine, Inc.*, 61 B.R. 210, 212-13 (Bankr. S.D.N.Y. 1986) (same); *Green v. City of New York*, 403 Fed. Appx. 626, 629 (2d Cir. 2010) (summary order); *see generally* 3 COLLIER ON BANKRUPTCY ¶ 330.03[9] (Lawrence P. King ed., 16th ed. 2016) (describing *First Colonial* and *Johnson* as the “leading cases to be considered in determining a reasonable allowance of compensation”).

38. Moritt Hock respectfully submits that a consideration of these factors should result in the Court’s allowance of the full compensation sought in this Application.

- a. Time and Labor Required. Moritt Hock billed a total of 827.4 hours of professional services and 489.8 hours of paraprofessional and other non-legal services during the Compensation Period. As evidenced by this Application, Moritt Hock professionals and paraprofessionals worked diligently and efficiently without unnecessary duplication of efforts throughout the Compensation Period. This is especially true when considering the nature and complexity of the issues that arose in the Chapter 11 Cases during the Compensation Period. In particular, the Compensation Period involved many material issues that required analysis of data, researching of applicable case law, and follow-up with subpoenaed parties on their productions or lack thereof. Moritt Hock respectfully submits that the hours spent were reasonable given the size and complexity of the Chapter 11 Cases and the significant legal issues raised.
- b. Novelty and Difficulty of the Questions. Moritt Hock tasked knowledgeable attorneys to research, analyze and provide advice on difficult and complex bankruptcy, litigation, finance and other issues. As further described herein, Moritt Hock’s skilled teams assisted the Creditors’ Committee and the Litigation Designees in researching and analyzing legal issues pertaining to third party challenges to the service of subpoenas, including claims of immunity under the Foreign Sovereign Immunities Act and objections based on the Hague Convention.
- c. Skill Requisite to Perform the Legal Services Properly. Moritt Hock believes that its recognized expertise in the area of bankruptcy litigation and corporate restructuring, its ability to draw from highly experienced professionals in other areas of Moritt Hock’s practice and its creative approach to the resolution of issues has benefited the Creditors’ Committee and the Litigation Designees. Due to the nature and complexity of the legal issues Moritt Hock was retained to investigate and/or prosecute in the Chapter 11 Cases, Moritt Hock was required to

exhibit a high degree of legal skill in areas related to, *inter alia*, bankruptcy and litigation matters. Additionally, Moritt Hock's strong working relationship with the Creditors' Committee's and Litigation Designees' other legal advisors enabled Moritt Hock to work with such advisors to track and analyze data produced by subpoenaed parties and address relevant legal issues during the course of its investigation.

- d. Preclusion of Other Employment by Applicant Due to Acceptance of the Case. Although Moritt Hock's representation of the Creditors' Committee and the Litigation Designees did not preclude its acceptance of new clients, the demands for immediate and substantive action in connection with the investigation relating to the Jointly Asserted Causes of Action imposed significant burdens on Moritt Hock professionals and paraprofessionals working concurrently on other matters.
- e. Customary Fee. The rates Moritt Hock charges for the services rendered by its professionals and paraprofessionals in the Chapter 11 Cases are the same rates Moritt Hock charges for professional and paraprofessional services rendered in comparable non-bankruptcy matters. Moritt Hock's fee structure also is equivalent to the fee structure used by Moritt Hock for restructuring, workout, bankruptcy, insolvency and comparable matters, as well as similar complex corporate and litigation matters, whether in-court or otherwise, regardless of whether a fee application is required. The firm's customary hourly rates and rate structure reflect that restructuring and related matters typically involve great complexity, numerous tasks requiring a high level of expertise and severe time pressures, as is the case here. Moritt Hock's rate structure is similar to the rate structure used by other, similar law firms that work on other, similar matters.
- f. Whether the Fee Is Fixed or Contingent. Pursuant to Bankruptcy Code sections 330 and 331, all fees sought by professionals employed under Bankruptcy Code section 1103 are contingent pending final approval by the Court and are subject to adjustment depending upon the services rendered and the results obtained. The contingency of full and actual compensation to Moritt Hock increased the risk Moritt Hock was assuming by representing the Creditors' Committee as special conflicts counsel in the Chapter 11 Cases.
- g. Time Limitations Imposed by the Client or Other Circumstances. As previously set forth herein, Moritt Hock was required to attend to certain issues arising in the investigation relating to the Jointly Asserted Causes of Action under compressed timelines. The tremendous efforts of Moritt Hock professionals and paraprofessionals in completing this work permitted the Creditors' Committee and the Litigation Designees to

address effectively various issues for the benefit of the Debtors' unsecured creditors.

- h. Amount Involved and Results Obtained. Moritt Hock professionals and paraprofessionals worked diligently to maximize value for the Debtors' estates and creditors. During the Compensation Period, and as described in the summary of services herein, Moritt Hock was instrumental in maximizing value for the benefit of unsecured creditors. In particular, Moritt Hock's efforts in connection with, among other things, the investigation relating to the Jointly Asserted Causes of Action effectively maximized the potential assets available for distribution to unsecured creditors. Moritt Hock respectfully submits that the fees requested in this Application are reasonable and appropriate when considering the results obtained on behalf of unsecured creditors as more fully described in the summary of services.
- i. Experience, Reputation and Ability of Attorneys. Attorneys in Moritt Hock's Litigation & Restructuring group are consistently recognized as leading attorneys in the field of bankruptcy and bankruptcy related litigation as well as creditors' rights, business reorganizations and liquidations under chapter 11 of the Bankruptcy Code. During the Compensation Period, Moritt Hock solicited the skill and expertise of its attorneys, a number of which have practiced law for over 20 years in a number of jurisdictions and legal disciplines. Moritt Hock attorneys have actively represented creditors and creditors' committees, as well as other parties in interest, in chapter 11 cases. Moritt Hock's extensive experience enables it to perform the services described herein competently and expeditiously.
- j. "Undesirability" of the Cases. This factor is not applicable to the Chapter 11 Cases.
- k. Nature and Length of Professional Relationship. Moritt Hock has been rendering professional services to the Creditors' Committee since it was selected as special conflicts counsel to the Creditors' Committee on January 2, 2020.

39. For the reasons set forth above, the services rendered by Moritt Hock were necessary and beneficial to the Creditors' Committee and consistently performed in a timely manner. The compensation sought in this Application is reasonable in light of the value of such services to the Creditors' Committee and all unsecured creditors, Moritt Hock's demonstrated skill and expertise in the bankruptcy field (as well as other areas of expertise relevant to the

Chapter 11 Cases) and the customary compensation charged by comparably skilled practitioners at Moritt Hock. Accordingly, Moritt Hock respectfully submits that the Court should approve the compensation for professional services and reimbursement of expenses sought herein.

40. No agreement or understanding exists between Moritt Hock and any other person for the sharing of any compensation to be received for professional services rendered or to be rendered in connection with the Chapter 11 Cases. No prior application has been made in this Court or in any other court for the relief requested herein as it relates to the Compensation Period.

ATTORNEY STATEMENT PURSUANT TO U.S. TRUSTEE GUIDELINES

41. The following is provided in response to the request for additional information set forth in ¶ C.5. of the U.S. Trustee Guidelines.

Question: Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.

Response: No.

Question: If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?

Response: Not applicable.

Question: Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

Response: No.

Question: Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.

Response: Yes. During the Compensation Period, approximately 50.58 hours and \$15,887.30 in fees were spent reviewing time records for compliance with

the Fee Guidelines. Most of these fees were incurred in connection with the preparation of the Second Interim Fee Application.

Question: Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: See above.

Question: If the fee application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

Response: Moritt Hock disclosed to the Creditors' Committee the hourly rates charged at the time of its retention. Moritt Hock increased its rates on December 1, 2020, consistent with its customary practice and as disclosed in the Moritt Hock Retention Application (as defined herein).

RESERVATION OF RIGHTS

To the extent that there are services rendered or expenses incurred that relate to the Compensation Period but were not processed prior to the preparation of the Application, Moritt Hock reserves the right to request additional compensation for such services and reimbursement of such expenses in a future application.

CONCLUSION

WHEREFORE, Moritt Hock respectfully requests: (a) an allowance on a final basis of compensation for professional services rendered during the Total Compensation Period in the amount of \$536,818.00 and expense reimbursement in the amount of \$12,031.22; (b) payment of a balance of \$17,890.90, consisting of (i) fees totaling \$17,883.50, representing 100% of the fees requested, but not yet paid, pursuant to the Twelfth Monthly Fee Statement and Fourth Interim Fee Application and (ii) \$7.40 for expenses requested, but not yet paid, pursuant to the Twelfth

Monthly Fee Statement and Fourth Interim Fee Application; and (c) such other and further relief as is just.

Dated: New York, New York
August 9, 2022

MORITT HOCK & HAMROFF LLP

By: /s/ James P. Chou
James P. Chou
Ted A. Berkowitz
Danielle J. Marlow
1407 Broadway - 39th Floor
New York, New York, 10018
Telephone: (212) 239-2000
Facsimile: (212) 239-7277

*Special Conflicts Counsel to the Official
Committee of Unsecured Creditors of
Sears Holdings Corporation, et al.*

EXHIBIT A

CERTIFICATION OF JAMES P. CHOU

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
In re: : Chapter 11
: :
SEARS HOLDINGS CORPORATION, *et al.*, : Case No. 18-23538 (RDD)
: :
: (Jointly Administered)
Debtors.¹ :
----- X

**CERTIFICATION UNDER THE FEE GUIDELINES IN RESPECT OF THE
FINAL FEE APPLICATION OF MORITT HOCK & HAMROFF LLP AS
SPECIAL CONFLICTS COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR FINAL ALLOWANCE OF COMPENSATION FOR
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD OF JANUARY 2, 2020 THROUGH SEPTEMBER 30, 2021**

I, James P. Chou, hereby certify that:

1. I am a partner with the law firm of Moritt Hock & Hamroff LLP ("Moritt Hock")
located at 1407 Broadway, New York, New York. Moritt Hock is special conflicts counsel to

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

the Creditors' Committee of Sears Holdings Corporation and its affiliated debtors and debtors in possession (collectively, the "Debtors").

2. In accordance with the Fee Guidelines, this certification is made with respect to the Application, for interim allowance of compensation and reimbursement of expenses incurred during the Compensation Period.

3. In respect of section B.1 of the Local Guidelines, I certify that:

- (a) I have read the Application;
- (b) to the best of my knowledge, information, and belief formed after reasonable inquiry, the fees and disbursements sought fall within the Fee Guidelines;
- (c) the fees and disbursements sought are billed at rates in accordance with those customarily charged by Moritt Hock and generally accepted by Moritt Hock's clients; and
- (d) in providing a reimbursable service, Moritt Hock does not make a profit on that service, whether the service is performed by Moritt Hock in-house or through a third party.

4. In accordance with section B.2 of the Local Guidelines and as required by the Interim Compensation Order, I certify that Moritt Hock has complied with those provisions requiring it to provide the Debtors and the Creditors' Committee with a statement of Moritt Hock's fees and disbursements accrued during the previous month, although, due to administrative limitations, such statements were not always provided within the timeframe set forth in the Local Guidelines or the Interim Compensation Order.²

5. In respect of section B.3 of the Local Guidelines, I certify that the Debtors,

² Moritt Hock has provided weekly accrual information to M-III Partners, L.P., the Debtors' restructuring advisors, on a weekly basis or as soon thereafter as was reasonably practicable.

the U.S. Trustee and the members of the Creditors' Committee are each being provided with a copy of the Application.

Dated: New York, New York
August 9, 2022

By: /s/ James P. Chou
James P. Chou

EXHIBIT B

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURE

Blended Hourly Rates		
Category of Timekeeper		All Timekeepers on Application for January 2, 2020 through September 30, 2021
Partner	\$595	\$609
Associates		
Paralegals	\$245	\$255
All Timekeepers Aggregated	\$420	\$432

¹ Consistent with the U.S. Trustee Guidelines, this **Exhibit B** discloses the blended hourly rate for the aggregate of all timekeepers of Moritt Hock who billed during the Total Compensation Period, excluding all data from timekeepers practicing primarily in the financial restructuring group.

EXHIBIT C

**COMPENSATION BY PROFESSIONAL FOR THE FINAL FEE APPLICATION
PERIOD OF JANUARY 2, 2020 THROUGH SEPTEMBER 30, 2021**

Name of Professional	Position	Department	Year Admitted	Hourly Billing Rate 2020	Hourly Billing Rate 2021	Total Hours Billed	Total Compensation
Ted A. Berkowitz	Partner	Restructuring/ Bankruptcy	1984	\$675	\$675	37.00	24,981.00
James P. Chou	Partner	Litigation	1997 (NY) 1996 (NJ)	\$595	\$615	184.90	\$110,253.50
Robert S. Cohen	Partner	Litigation	1987 (NY) 1986 (NJ)	\$595	N/A	1.80	\$1,071.00
Theresa A. Driscoll	Partner	Restructuring/ Bankruptcy	2000	\$560	\$575	80.50	\$45,483.50
Danielle J. Marlow	Partner	Litigation	1997	\$550	\$565	258.80	\$142,575.50
Stephen T. Breidenbach	Associate	Cyber Security/ Technology	2018	\$340	N/A	19.90	\$6,766.00
Lauren Bernstein	Associate	Litigation	2015 (NY) 2015 (NJ)	\$325	N/A	10.60	\$3,445.00
Nicholas G. Calabria	Associate	Litigation	2020	\$225	N/A	44.80	\$10,080.00
Jennifer Calamia	Associate	Litigation	2018	\$295	N/A	5.90	\$1,740.50
Alex D. Corey	Associate	Litigation	2014	\$395	N/A	153.50	\$60,632.50

Matthew S. De La Torre	Associate	Litigation	2017	\$295	N/A	28.80	\$8,496.00
Tina M. Kassangana	Associate	Corporate	2021	\$275	N/A	0.90	\$247.50
Daniel Almont	Paralegal	Litigation/ Bankruptcy	N/A	\$250	N/A	5.20	\$1,300.00
Camille Hay	Paralegal	Litigation/ Bankruptcy	N/A	\$245	N/A	5.30	\$1,298.50
Victoria Jankowski	Paralegal	Litigation/ Bankruptcy	N/A	\$245	\$260	115.90	\$29,198.00
Sheila Marino- Thomas	Paralegal	Litigation	N/A	\$245	\$260	363.40	\$89,049.50

EXHIBIT D

SUMMARY OF COMPENSATION BY TASK CODE

Task Code	Task Code Category	Actual Hours	Actual Amount
B110	Case Administration	68.10	\$34,068.00
B120	Asset Analysis/ Recovery	819	\$309,891.50
B160	Fee/Employment	327.40	\$145,244.50
B191	Litigation/Adversary	104.40	\$47,414.00
TOTAL		1,317.20	\$536,618.00

EXHIBIT E

TIMEKEEPER RECORDS



MORITT HOCK & HAMROFF LLP
Invoice - January 2, 2020 through March 31, 2020

Date	Prof	Narrative	Hours	Bankruptcy Code
Matter ID: N-1944.001				
01/03/2020	JPC	Conference call w/ Akin team and T. Berkowitz re: background.	0.60	B160
01/03/2020	TAB	Confer w/J. Chou retention app and sections to complete.	0.60	B160
01/10/2020	JPC	Reviewing/analyzing Sears adversary complaint.	2.00	B191
01/11/2020	JPC	Further reviewing/analyzing Sears adversary complaint.	1.00	B191
01/13/2020	JPC	Attention to engagement letter, including review relevant provisions in connection order.	1.60	B191
01/21/2020	JPC	Confer w/ D. Marlow re: upcoming tasks.	0.10	B191
02/05/2020	JPC	Attention to documents from M. Young.	0.40	B191
02/07/2020	DJM	Preparation for call with Akin Gump (D. Chapman, M. Young) regarding subpoenas, including review of background materials (1.00 hours), call with Akin Gump (D. Chapman, M. Young) regarding subpoenas, Moritt Hock role, upcoming tasks (0.6 hours), call with J.	2.00	B191
02/07/2020	JPC	Reviewing/analyzing background materials in preparation for conference call w/ Akin team.	0.80	B191
02/07/2020	JPC	Conference call w/ Akin re: subpoenas.	0.50	B191
02/07/2020	JPC	Conference call w/ T. Berkowitz and D. Marlow re: staffing and tasks.	0.30	B191
02/07/2020	TAB	Conference call with Akin team re: subpoenas.	0.50	B191
02/07/2020	TAB	Conference call with J Chou and D Marlow re staffing and tasks.	0.30	B191
02/10/2020	ADC	Research & Analysis - Reviewed Norges Bank subpoena and Norges objections(.2); researched law concerning the basis of Norges objections and drafted memo summarizing the law(5.9).	6.10	B191
02/10/2020	TAB	Meeting with M. Cardello, D. Marlow re: staffing of matter (.3); meeting with M. re, D. Marlow re: Staffing (.2).	0.50	B191
02/10/2020	JPC	Confer w/ A. Corey re: Norges objection and research findings.	0.20	B191
02/10/2020	DJM	Meeting with M. Cardello, T. Berkowitz regarding staffing of matter (0.3 hours), meeting with M. Re, T. Berkowitz regarding staffing of	0.50	B191
02/11/2020	DJM	Draft/revise subpoenas, review of forms, research regarding contact information for companies to be subpoenaed.	3.00	B191
02/11/2020	ADC	Further review and analysis of Norges objections to Rule 45 subpoena(.2) and drafting memo of law analyzing the issue(3.7).	3.90	B191
02/11/2020	JPC	Further confer w/ A. Corey re: additional research on subpoenas on U.S. branches of central banks.	0.20	B191
02/12/2020	ADC	Research & analysis of jurisdiction over Norges bank and other similar foreign entities(3.0); further drafting research memo(1.3).	4.30	B191
02/12/2020	JPC	Confer w/ A. Corey re: jurisdictional analysis re: Norges objection.	0.20	B191
02/13/2020	ADC	Research & Analysis of Norges subpoena objections(1.3); drafted research memo thereof(1.4).	2.70	B191
02/15/2020	JPC	Begin review of research memo re: Norges Bank objections to subpoena.	0.40	B191
02/18/2020	JPC	Review draft subpoena from D. Marlow (.1); email to D. Marlow and T. Berkowitz re: same. (.1).	0.20	B191
02/18/2020	TAB	Review email from J Chou re review of draft subpoena.	0.10	B191
02/20/2020	JPC	Further review/analyze and comment on memo re: arguments against Norges Bank objections.	0.20	B191
02/20/2020	JPC	Confer w/ D. Marlow re: status of subpoenas.	0.10	B191
02/20/2020	DJM	Confer w/J. Chou re: status of subpoenas.	0.10	B191
02/20/2020	TAB	Conf. with J. Chou re: status of subpoenas.	0.10	B191
02/21/2020	DJM	Calls with Sheila Thomas and James Chou regarding subpoenas.	0.40	B191
02/21/2020	SMT	Obtained contacts and addresses for subpoenas to multiple entities.	0.60	B191



MORITT HOCK & HAMROFF LLP

Invoice - January 2, 2020 through March 31, 2020

02/23/2020	JPC	Further revisions to memo re: arguments in support of response to Norges Bank objections.	1.40	B191
02/24/2020	ADC	Further researched impact of Hague Evidence Convention on Norges' arguments and finalized research memo.	1.70	B191
02/24/2020	SMT	Obtained contacts and addresses for subpoenas to multiple entities.	0.90	B191
02/24/2020	JPC	Confer w/ A. Corey re: responses to Norges Bank objections.	0.20	B191
02/25/2020	DJM	Call/meeting with Sheila Thomas regarding subpoenas, service of same.	0.60	B191
02/25/2020	SMT	Prepared subpoenas to produce documents for multiple entities; forwarded same to Executive Attorney Service for service.	2.60	B191
02/25/2020	JPC	Confer w/ T. Berkowitz re: status of retention app.	0.20	B160
02/25/2020	JPC	Review current draft of retention app (.3); drafting portions of retention app. (2.1).	2.40	B160
02/25/2020	TAB	Confer w/J. Chou retention app and sections to complete.	0.20	B160
02/26/2020	SMT	Called Executive Attorney Service regarding service of subpoenas outside New York.	0.20	B191
02/27/2020	SMT	Prepared additional subpoenas to produce documents for multiple entities; forwarded same to Executive Attorney Service for service.	3.10	B191
02/27/2020	ADC	Drafted Application (4.50); Conferred with J. Chou (0.3).	4.80	B160
02/27/2020	JPC	Review and comment on retention app. (1.0); confer w/ A. Corey re: retention application (.3); further confer w/ A. Corey (.3).	1.60	B160
02/28/2020	ADC	Outlined and drafted letter to respond to Norges objections (0.50).	0.50	B191
02/28/2020	SMT	Emailled Executive Attorney Service updated subpoena to Nomura; telephone conversation with same regarding address verifications and change of addressee concerning Credit Suisse and Sumitomo Mitsui Trust Asset Management Co Ltd.; telephone call with Executive Attorney Service representative regarding possible service for Monday.	0.90	
02/28/2020	DJM	Coordination of service of subpoenas, calls/e-mails regarding same.	0.70	B191
02/28/2020	JPC	Review and comment on latest draft of retention app.	1.10	B160
02/28/2020	ADC	Draft/revise conflict counsel application for MHH (3.8)	3.80	B160
03/02/2020	ADC	Draft/revise conflicts counsel application.	1.50	B191
03/02/2020	JPC	Email to D. Marlow re: responses to objections to subpoena(.10)	0.10	B191
03/02/2020	JPC	Finalizing drafts of retention app.	1.80	B160
03/03/2020	SMT	Revised Sumitomo Mitsui Trust Asset Management Co. Ltd. subpoena for service.	0.30	B191
03/03/2020	SMT	Researched new address for Sumitomo Mitsui Trust Asset Management Co. Ltd.	0.50	B191
03/03/2020	SMT	Called Comerica legal representative regarding service and correct address.	0.40	B191
03/03/2020	DJM	Telephone conversations with recipients of subpoenas (Morgan Stanley, Sculptor, Citibank, Sumitomo) (1.0 hours), e-mails with recipients of subpoenas (0.7 hours), review of memo from A. Corey regarding objections by Norges Bank (0.5 hours), e-mails with S. Thomas regarding service of subpoenas, status (0.5 hours), call with M. Young regarding subpoenas (0.2 hours), call with J. Chou regarding subpoenas	2.70	B191
03/04/2020	DJM	Call with counsel for Sandell (0.2 hours), call with counsel to D.E. Shaw (0.2 hours), multiple e-mails with S. Thomas regarding service of subpoenas, status (0.5 hours), call with M. Young regarding subpoenas (0.2 hours), call with J. Chou regarding subpoenas	1.20	B191
03/04/2020	ADC	Draft/revise letter in response to Norges' objections to the subpoena.	8.70	B191
03/04/2020	ADC	Draft/revise retention application papers.	0.80	B160
03/04/2020	JPC	Review and provide comments/revisions to letter to Norges Bank.	1.10	B191
03/04/2020	JPC	Call with D. Marlow re subpoenas	0.10	B191
03/04/2020	SMT	Telephone call to Wells Fargo regarding service of subpoena and correct address; emailed Executive Attorney Service regarding	0.60	B191
03/04/2020	SMT	Emails with D. Marlow regarding Wells Fargo service of subpoena and correct address and Comerica's service; emailed same	0.30	B191
03/04/2020	SMT	Updated subpoena status chart.	0.40	B191
03/05/2020	DJM	Review of letter from Mitsubishi bank regarding subpoena (0.2 hours), review of response from Goldman Sachs (0.1 hours).	0.30	B191
03/05/2020	ADC	Draft/revise Application papers (0.70); prepared entity list for conflicts check (1.00)	1.70	B160



MORITT HOCK & HAMROFF LLP

Invoice - January 2, 2020 through March 31, 2020

03/05/2020	JPC	Attention to retention app and additional conflicts checks	1.70	B160
03/05/2020	SMT	Updates to subpoena service tracking chart concerning affidavits of service by Executive Attorney Service, objections and requests	0.60	B191
03/05/2020	SMT	Response email to Executive Attorney Service regarding subpoena service affidavits; emailed same regarding service on Wells	0.20	B191
03/05/2020	SMT	Emailed D. Marlow status of service to Mitsubishi and Bank of Nova Scotia.	0.20	B191
03/06/2020	ADC	Worked to identify additional entities for conflicts check as part of MHH Application as conflicts counsel.	2.70	B160
03/06/2020	DJM	Call with Bain Capital regarding subpoena (0.2 hours), call and e-mail with Mitsubishi bank regarding subpoena (0.3 hours), review and revision of chart regarding subpoenas and sending of same to Akin Gump (0.5 hours).	1.00	B191
03/07/2020	TAB	Conference call with Akin team re: subpoenas.	2.00	B191
03/09/2020	ADC	Other managed conflict check process.	0.40	B160
03/09/2020	DJM	Call with counsel to Blackstone Group regarding subpoena (0.4 hours), call with counsel to Cyrus regarding subpoena (0.3 hours), e-mails with counsel to Societe General regarding subpoena (0.2 hours), coordination with S. Thomas regarding updating chart (0.3	1.20	B191
03/09/2020	SMT	Updates to subpoena service tracking chart.	0.40	B191
03/09/2020	SMT	Emailed D. Marlow updated subpoena service tracking chart.	0.20	B191
03/09/2020	SMT	Add documents responsive to subpoena to file.	0.20	B191
03/10/2020	DJM	Review and analysis of objections by Sculptor.	0.40	B191
03/11/2020	ADC	Draft/revise Norges subpoena response letter	0.30	B191
03/11/2020	DJM	Review objections from Cyrus, BlackRock, Barclays, and BNY Mellon (0.8 hours), review and response to e-mail from Akin Gump regarding subpoenas, status, service (0.6 hours), coordination with S. Thomas regarding subpoenas (0.2 hours).	1.60	B191
03/11/2020	JPC	Review prebill for February time for monthly fee statement bill (.8).	0.80	B160
03/11/2020	JPC	Revising response letter to Norges (.7); confer w/ A. Corey re: arguments and case law in response to Norges objections (.7)	1.40	B191
03/11/2020	SMT	Updates to subpoena service tracking chart.	0.30	B191
03/11/2020	SMT	Emailed updated subpoena service chart to D. Marlow.	0.20	B191
03/11/2020	SMT	Add documents responsive to subpoena to file.	0.20	B191
03/12/2020	ADC	Revised Chou Decl. with new conflicts categories (0.5).	0.50	B160
03/12/2020	JPC	Review email from A. Corey re: blocking statutes in relation to Hague Convention and Rule 45 subpoenas (.2); confer w/ A. Corey	0.60	B191
03/12/2020	ADC	Research & Analysis of Hague Convention application to specific jurisdiction analysis (.90)	0.90	B191
03/13/2020	SMT	Prepared additional subpoenas to produce documents for multiple entities; audit of same.	0.80	B191
03/13/2020	DJM	E-mails with Herrick law firm regarding coordination of subpoenas, review of subpoenas in connection with same (0.8 hours), coordination with S. Thomas regarding service of additional subpoenas (0.4 hours), review of response from AllianceBernstein (0.2	1.40	B191
03/13/2020	ADC	Review and analysis of entities for additional conflicts check for retention application	0.70	B160
03/13/2020	SMT	Forwarded additional subpoenas to Executive Attorney Service for service; telephone call to same regarding addresses.	0.50	B191
03/13/2020	SMT	Added documents responsive to subpoena to file.	0.30	B191
03/16/2020	ADC	Draft/revise Sears retention application papers.	0.60	B160
03/16/2020	DJM	Call with Herrick Feinstein regarding subpoenas served upon Blackstone (0.2 hours), e-mails with counsel for Mitsubishi Bank regarding subpoena, protective order (0.3 hours).	0.50	B191
03/16/2020	CH	Review and compare Schedule 1 against the Chou Decl. Schedule One and Schedule I from the pdf Herrick App (page 32-39); Outline discrepancies to ADC; Edit Schedule 1	4.50	B160
03/17/2020	ADC	Draft/revise retention application papers.	3.50	B160



MORITT HOCK & HAMROFF LLP

Invoice - January 2, 2020 through March 31, 2020

03/17/2020	DJM	Telephone conversation with M. Young regarding subpoenas, e-mails with M. Young (0.5 hours), call with Bank of America regarding subpoena (0.4 hours), review of objections from Barclays and call to same (0.3 hours).	1.20	
03/17/2020	SMT	Updates to subpoena service tracking chart.	0.40	B191
03/17/2020	JPC	Revise latest draft retention application papers.	3.00	B191
03/18/2020	DJM	Telephone conversation with Vanguard bank (0.3 hours), re-service of Vanguard subpoena (0.3 hours), follow up call with BlackRock and provision of protective order to same (0.3 hours), follow up e-mails with Mizuho and coordination of meet and confer with same (0.5 hours), follow up e-mail to Comerica, provision of information to same (0.2 hours), follow up e-mail to Citi and provision of	4.20	B160
03/18/2020	SMT	Emailled updated subpoena service chart to D. Marlow; response email to same concerning status of Comerica and Wells Fargo re-	0.40	B191
03/18/2020	SMT	Updates to subpoena service tracking chart.	0.60	B191
03/18/2020	SMT	Add documents responsive to subpoena to file.	0.20	B191
03/19/2020	DJM	Telephone conversation with counsel to Barclays and follow up e-mails (0.6 hours), emails with Comerica (0.2 hours), e-mails with Nomura (0.2 hours), review of production by Sumitomo Mitsui (0.5 hours), review of articles/cases regarding preference/fraudulent	3.50	B191
03/19/2020	JPC	Review response to subpoena from Sumitomo.	0.20	B191
03/19/2020	SMT	Updates to subpoena service tracking chart.	0.40	B191
03/19/2020	SMT	Response email to Executive Attorney Service regarding additional subpoenas.	0.20	B191
03/20/2020	DJM	Telephone conversation with Mizuho bank (0.5 hours), review of correspondence from Mizuho Bank (0.5 hours).	1.00	B191
03/20/2020	SMT	Add documents responsive to subpoena to file.	0.20	B191
03/20/2020	SMT	Updates to subpoena service tracking chart.	0.30	B191
03/20/2020	SMT	Emailled updated subpoena service chart to D. Marlow.	0.20	B191
03/23/2020	SMT	Updates to subpoena service tracking chart.	0.20	B191
03/23/2020	SMT	Add documents responsive to subpoena to file.	0.20	B191
03/23/2020	DJM	Telephone conversation with counsel to CSS (0.5 hours), provision of 2004 motion and order and adversary complaint to counsel for CSS (0.7 hours), review of 2004 motion and order (0.8 hours), review of production and correspondence by Mitsubishi Bank (1.0	3.00	B191
03/23/2020	ADC	Draft/revise MHH Application.	0.30	B160
03/23/2020	TAD	Review James Chou email re: monthly fee statement(.1) review Sears confirmation order re: post-confirmation professional retentions(.6) analysis and respond to James Cho re: same(.3).	1.00	B160
03/25/2020	DJM	Review of subpoena responses/objections by Blackstone Group (0.5 hours), e-mail to counsel for Blackstone Group regarding request for meet and confer (0.2 hours), e-mail to counsel for Blackstone Group regarding Herrick Feinstein subpoena and potential	1.00	B191
03/26/2020	DJM	Telephone conversation with counsel for Blackstone (0.5 hours), telephone conversation with counsel for Vanguard (0.4 hours), e-	1.00	B191
03/27/2020	SMT	Add documents responsive to subpoena to file.	0.20	B191
03/27/2020	SMT	Updates to subpoena service tracking chart.	0.20	B191
03/30/2020	DJM	Telephone conversation with D. Chapman and Melodie Young of Akin Gump regarding status, coordination (0.4 hours), follow up e-mails with M. Young (0.5 hours), e-mails with S. Thomas regarding service of Wells Fargo, follow up with non-responding parties (0.6 hours), follow up with Bank New York Mellon (0.1 hours), follow up with Societe Generale (0.1 hours).	1.70	B191
03/30/2020	SMT	Revised Wells Fargo & Company Private Banking and Investment Bank subpoena for service.	0.50	B191
03/30/2020	SMT	Researched new address for Wells Fargo & Company Private Banking and Investment Bank.	0.50	B191
03/30/2020	SMT	Emailled Executive Attorney Service attaching Wells Fargo subpoena for service.	0.20	B191
03/30/2020	JPC	Conf. call w/ Akin team re: status and issues relating to responses to subpoenas.	0.40	B191
03/31/2020	TAB	Prepare for and Conference call with Akin to review Retention and interim compensation issues.	0.30	B160



MORITT HOCK & HAMROFF LLP
Invoice - January 2, 2020 through March 31, 2020

03/31/2020	TAB	Email exchange with J Chou re: billing issues.	0.20	B160
03/31/2020	TAB	Conference call with Akin and MHH team re: retention application and interim compensation issues	0.30	B160
03/31/2020	ADC	Communicate (other outside counsel) to finalize MHH application papers and coordinate Tucker signing the application and his	0.80	B160
03/31/2020	DJM	Review of response/production by Goldman Sachs (0.4 hours), review of response/production by CSS (0.4 hours), updating of chart	1.00	B191
03/31/2020	SMT	Updates to subpoena service tracking chart.	0.70	B191
03/31/2020	TAD	Review Sears confirmation order in advance of call with Akin on billing and retention issues.	0.40	B160
03/31/2020	TAD	Attend call with Akin re: billing and retention issues(.3); follow with Akin re: same(.1); emails with A. Corey(.1); review interim comp	0.60	B160
03/31/2020	JPC	Prepare for (.2); conference call w/ Akin and MHH team re: retention application and interim compensation issues (.3).	0.50	B160
03/31/2020	JPC	Review latest retention app for execution and circulation.	1.50	B160
03/31/2020	JPC	Review Order re: Interim fees.	0.50	B160
03/31/2020	JPC	Email w/ T. Berkowitz re: billing issues.	0.20	B160
			Grand Total:	148.10



MORITT HOCK & HAMROFF LLP
INVOICE - April 1, 2020 - April 30, 2020

<u>Date</u>	<u>Prof</u>	<u>Narrative</u>	<u>Task Code</u>	<u>Hours</u>
4/1/2020	SMT	Updates to subpoena service tracking chart.	B120	0.5
4/1/2020	DJM	Review and Analysis of D.E. Shaw response and production (0.4); review of Goldman Sachs objections and drafting and sending of e-mail in response (0.6); updating of chart (0.1).	B120	1.1
4/2/2020	DJM	Review and analysis of productions by CSS and D.E. Shaw (0.4); e-mail to D. Chapman and M. Young regarding same (0.2).	B120	0.6
4/2/2020	ADC	Draft/revise Application papers and circulated to Akin.	B160	1.7
4/2/2020	JPC	Review additional productions.	B120	0.3
4/2/2020	TAD	Follow up re: status of retention papers, proposed order and fee statement.	B160	0.2
4/6/2020	ADC	Review and Analysis of case law cited by Norges in objection to subpoena.	B120	0.8
4/6/2020	DJM	Follow up e-mails with numerous banks (Nomura, UBS, Comerica, BlackRock, Blackstone, Merrill Lynch, Citibank, Barclays, Societe Generale) regarding responses to subpoena (1.5), follow up with S. Thomas regarding service, non-responsive banks (0.5), review of draft letter to Norges Bank (0.3).	B120	2.3
4/6/2020	JPC	Revising letter to Norges Bank re: objection to Subpoena (2.5); e mail to D. Marlow re: same requesting comment on specific issues (0.2).	B120	2.7
4/6/2020	SMT	Added documents responsive to subpoena to file.	B120	0.4
4/6/2020	SMT	Emailed D. Marlow regarding status of select entities and service of same.	B120	0.2
4/7/2020	DJM	Review of Morgan Stanley objections to subpoena and sending of response to same (0.5); follow up with Highland Capital regarding subpoena, lack of response (0.5); follow up with Bank of Nova Scotia regarding subpoena, lack of response (0.5); review of message from Wells Fargo and follow up (0.3).	B120	1.8
4/7/2020	ADC	Worked with J. Chou to revise Norges subpoena letter.	B120	0.6
4/7/2020	JPC	Further revising letter to Norges Bank (4.8) Review and analyze case law re: jurisdictional analysis in connection with letter in response to Norges Bank's objection so subpoena (1.5); Emails with A. Corey re: jurisdictional analysis for letter to Norges Bank (0.5); Prepare cover email to counsel for Norges Bank and circulate (0.5).	B120	7.3
4/7/2020	TAB	Review and revise Bank Norges letter regarding response to Objection to Subpoena.	B120	0.5
4/7/2020	SMT	Emailed and attached Highland Capital and The Bank of Nova Scotia for attorney review (0.2); emailed and attached Wells Fargo subpoena after attorney communication with same (0.2).	B120	0.4
4/7/2020	SMT	Draft/revise subpoena to Highland Capital (0.2); draft/revise subpoena to The Bank of Nova Scotia (0.2).	B120	0.4
4/8/2020	SMT	Responded to emails regarding affidavits of service of select entities (0.3); emailed and attached copies of Jefferies LLC and Wolverine Asset Management LLC affidavits of service to D. Marlow (0.3).	B120	0.6
4/8/2020	SMT	Draft/revise subpoena to Highland Capital Management for service.	B120	0.5
4/8/2020	SMT	Emailed Executive Attorney Service regarding service on Highland Capital (0.3); emailed same attaching new Highland Capital Management subpoena for service (0.2).	B120	0.5
4/8/2020	DJM	Research regarding agent for service of Highland Capital, coordinate with S. Thomas regarding service of new subpoena (0.7), follow up with Jefferies regarding subpoena, research of relevant persons to contact (0.5), follow up with Wolverine regarding subpoena (0.2); research of relevant persons to contact (0.6).	B120	2.0

4/8/2020	ADC	Finalized MHH application papers to be filed on April 9, 2020.	B160	0.7
4/8/2020	SMT	Added objections and affidavits of service to subpoena file.	B120	0.3
4/9/2020	ADC	Coordinated with MHH team to get papers filed on Pacer; circulated filing to Akin; worked with Prime Clerk to get papers served.	B160	1.1
4/9/2020	TAB	Final Review of retention documents.	B160	0.8
		Meet and confer with Goldman Sachs (0.5); meet and confer with Jefferies (0.5); follow up e-mails with Jefferies (0.6); e-mails with AQR Capital		
4/9/2020	DJM	(0.2); updating of chart (0.2).	B120	2.0
4/9/2020	VJ	Emails with ADC and JPC and TAB regarding finalizing papers and filing of papers.	B160	1.1
4/9/2020	VJ	E-file Application to Appoint MHH as Special Counsel.	B160	0.8
		Emailled Executive Attorney Service regarding service upon Teachers Insurance and Annuity Association of America and instructing not to serve		
4/9/2020	SMT	if not already attempted.	B120	0.2
4/9/2020	JPC	Emailing V. Jankowski, A. Corey and T. Berkowitz re: retention app filing issues (0.5); reviewing ECF filing requirements (0.5).	B160	1.0
		Correspond with V. Jankowski re: SDNY bankruptcy electronic filing rules (0.2); review local rule and procedural guidelines re: same (0.3);		
4/9/2020	TAD	correspond with Zach Lanier re: service of fee application (0.1).	B160	0.6
4/9/2020	SMT	Added affidavits of service to subpoena file.	B120	0.3
4/9/2020	TAB	Work on issue related to execution of documents under the local rules.	B160	0.3
4/10/2020	SMT	Updates to subpoena service tracking chart.	B120	0.4
4/10/2020	SMT	Emailled Executive Attorney Service regarding status of remaining subpoenas.	B120	0.2
4/13/2020	DJM	Download, review and analysis of Citibank production (1.0); coordination with S. Thomas regarding same (0.5).	B120	1.5
4/13/2020	SMT	Add documents responsive to subpoena to file.	B120	0.3
		Updates to subpoena service tracking chart; draft and revised additional subpoenas to Credit Suisse, Deutsche Bank, and Legal & General		
4/14/2020	SMT	Investment.	B120	1.6
4/14/2020	SMT	Added objections, affidavits of service, and documents responsive to subpoena to file.	B120	0.3
4/14/2020	SMT	Emailled Executive Attorney Service and attached additional subpoenas for service.	B120	0.2
		Discussed billing application procedure and reviewed sample application (0.7); worked with process server to get certificate of service (0.2);		
4/14/2020	ADC	scheduled MHH application dates (0.1).	B160	1.0
		Follow up with Equitable regarding lack of response to subpoena, research regarding relevant contact to e-mail (0.5); follow up with TIAA		
		regarding lack of response to subpoena; research regarding contact to e-mail (0.5); research regarding potential US service of Deutsche Bank,		
		Credit Suisse, Bank of Canada, other foreign entities; coordination with S. Thomas regarding same (1.2); follow up with Mizuho, BNY Mellon		
4/14/2020	DJM	(0.2), updating of chart (0.3)	B120	2.7
4/14/2020	VJ	Telephone conversation with TAD and ADC regarding MHH fee application.	B160	0.5
4/14/2020	VJ	Draft MHH fee application form.	B160	1.3
4/14/2020	VJ	Telephone conversation with TAD regarding fee application and billing.	B160	0.4
		Review bankruptcy billing issues with Alex Corey and V. Jankowski (0.3); review draft fee statement template and correspond with V. Jankowski		
4/14/2020	TAD	re: same (0.3); review and edit time records to comply with court and UST fee guidelines (0.9).	B160	1.5
4/15/2020	SMT	Added affidavits of service and documents responsive to subpoena to file.	B120	0.9
		Review and analysis of documents produced by Nomura (0.5); call with counsel for TIAA (0.4); e-mails with counsel for Equitable (0.2);		
4/15/2020	DJM	coordination with S. Thomas regarding service of additional subpoenas (0.2).	B120	1.3
4/15/2020	VJ	Review Affidavit of Service and e-file with Court.	B160	0.3
4/15/2020	SMT	Revised additional subpoenas to Credit Suisse.	B120	0.3
4/15/2020	SMT	Emailled Executive Attorney Service revised Credit Suisse subpoenas for service.	B120	0.2
		Call with counsel for AXA Equitable (0.4), drafting and sending of follow up e-mail regarding receipt of Lands End shares (0.5), e-mail to Akin		
4/16/2020	DJM	Gump regarding issues raised by AXA Equitable, review of relevant SEC rules (0.6).	B120	1.5

4/16/2020	ADC	Drafted MHH First Fee Application.	B160	3.0
4/16/2020	SMT	Added affidavits of service to subpoena file.	B120	0.2
4/16/2020	VJ	Register JPC and TAB for hearing in Sears bankruptcy.	B160	0.3
		Emailed Executive Attorney Service regarding outstanding affidavits of service and service of Credit Suisse (0.3); emailed same attaching revised		
4/16/2020	SMT	Credit Suisse subpoenas (0.1).	B120	0.4
4/16/2020	SMT	Revised Credit Suisse subpoenas.	B120	0.2
4/17/2020	SMT	Added documents responsive to subpoena to file and objections to same.	B120	0.4
		Review and analysis of objections by Jefferies (0.4); review and analysis of production by Geode Capital (0.4); call with counsel for Invesco (0.3);		
4/17/2020	DJM	updating of chart/coordination with S. Thomas (0.3); review of e-mail from FTI regarding Equitable (0.2)	B120	1.6
		Review comments to pre-bill and discuss with M. Cimmino (0.6); review SDNY and UST fee guidelines re: same (0.5); correspond with James		
4/17/2020	TAD	Chou (0.1).	B160	1.2
4/19/2020	JPC	Attention to docket re: responses to retention app (0.1); Email w/ Akin re: same (0.1).	B160	0.2
4/20/2020	SMT	Added documents responsive to subpoena to file.	B120	0.2
4/20/2020	ADC	Draft/revise non-objection order request (0.4); corresponded with Akin (0.2); reviewed Norges response to letter (0.4).	B120	1.0
		Follow up with UBS, Morgan Stanley, Merrill Lynch, BlackRock, Comerica regarding subpoenas (0.6); Review of production by InvestCorp (0.4);		
4/20/2020	DJM	research regarding service of Wells Fargo, coordination with S. Thomas regarding same (0.7)	B120	1.7
4/20/2020	DJM	Review of retention application in preparation for team call.	B160	0.5
4/20/2020	VJ	Check docket for opposition and email ADC.	B160	0.2
		Review and revise certificate of no objection (0.2); review amended case management order and Local Bankruptcy Rule 9075-2 (0.4);		
4/20/2020	TAD	correspond with team re: same (0.2).	B160	0.8
4/20/2020	JPC	Review and analyze email response from Norges Bank re: subpoena; emails w/ A. Corey re: same.	B120	0.5
		Draft/revise certificate of no objection and proposed order (1.5); call with Akin (0.2); call with J. Chou to discuss Norges recent objection (0.5);		
4/21/2020	ADC	researched Norway's FSIA service objection (3.0).	B120	5.2
4/21/2020	SMT	Draft/revise subpoena to Wells Fargo Securities LLC for service.	B120	0.4
4/21/2020	SMT	Emailed Executive Attorney Service attaching subpoena and exhibit A for service.	B120	0.2
4/21/2020	SMT	Emails with D. Marlow regarding voicemail from Wells Fargo and new subpoena service to same.	B120	0.4
4/21/2020	SMT	Added documents responsive to subpoena to file.	B120	0.4
4/21/2020	SMT	Reviewed telephone message from Wells Fargo Summons and Subpoena Department regarding service of entity.	B120	0.1
4/21/2020	TAB	Review and analyze Bank Norges response regarding jurisdiction.	B120	0.3
4/21/2020	SMT	Emailed Executive Attorney Service regarding service on Wells Fargo and attaching new subpoena.	B120	0.3
		Review and Analysis of Blackstone production (0.5); coordination with S. Thomas regarding service of Wells Fargo (0.2); e-mails with BNY		
4/21/2020	DJM	Mellon regarding subpoena (0.2); team call regarding retention application (0.3); e-mails with Morgan Stanley regarding subpoena (0.1); e-mails with Barclays regarding subpoena (0.1); e-mails with Comerica regarding subpoena (0.1).	B120	1.5
		Review Certificate of No Objection and comment on same (0.2); email w/ A. Corey re: revisions to Certificate of No Objection (0.1).		
4/21/2020	JPC	Participate in call with Akin team re: hearing on retention app. (0.2); t/c w/ T. Berkowitz re: hearing before Judge Drain on 4/23 re: retention	B160	0.3
4/21/2020	JPC	app. (0.3).	B160	0.5
4/21/2020	VJ	E-file Certificate of No Objection and send filed copy to TAD.	B160	0.4
4/21/2020	VJ	Email copies of proposed order, certificate no objection, Application and Affidavit of Service to Judge Drain.	B160	0.4
4/21/2020	JPC	Confer with A. Corey re: latest correspondence from Norges Bank and additional follow-up.	B160	0.5
4/21/2020	TAD	Call with Donna Federlein to review billing codes and tailor same for matter (0.6); correspond with Sears Team re: billing procedures (0.4).	B120	1.0

4/21/2020	TAD	Review and finalize CNO (0.3); review proposed retention order, revise for submission (0.3); review and discuss same with A. Corey (0.1); finalize for submission and correspond with V. Jankowski re: same (0.4).	B160	1.1
4/21/2020	TAB	Prepare for conference call with Akin in preparation for Court Hearing on Thursday including review of retention application and hearing procedures.	B160	0.3
4/21/2020	TAB	Participate on Conference call with Akin to discuss presentation at hearing and to anticipate Judge Drain's potential queries.	B160	0.2
4/21/2020	TAB	Participate on call with James Chou to discuss presentation and process for hearing.	B160	0.2
4/21/2020	TAB	Review and approve Certificate of No-Objection for filing.	B160	0.2
4/22/2020	DJM	Call with Morgan Stanley (0.3); e-mail to Morgan Stanley providing requested information (0.3); follow up with Goldman Sachs (0.1); research regarding potential service of Deutsche Bank (0.1); updating of chart (0.1).	B120	0.9
4/22/2020	ADC	Research & Analysis of Norges Bank FSIA subpoena service arguments (5.6); contacted vendors about service (0.4); drafted research memo (3.2); drafted talking points for oral argument on MHH application (1.2); call with J. Chou to discuss research (0.6).	B160	11.0
4/22/2020	TAB	Prepare for hearing on application to retain MHH including review of all related documents and plan provisions and review of docket.	B160	2.2
4/22/2020	SMT	Emailled Executive Attorney Service regarding service on Deutsche Bank Private Banking and Investment Banking Investment.	B120	0.2
4/22/2020	SMT	Draft/revise subpoena to Deutsche Bank Private Banking and Investment Banking Investment.	B120	0.4
4/22/2020	TAD	Correspond re: hearing on retention application.	B160	0.2
4/22/2020	JPC	T/c w/ A. Corey re: research findings and analysis of Norges Bank's arguments concerning service on foreign state.	B120	0.3
4/22/2020	JPC	Review, analyze and consider research findings in A. Corey memo re: arguments raised by Norges Bank.	B120	0.5
4/22/2020	JPC	Review talking points from A. Corey for hearing on retention app.	B160	0.2
4/22/2020	JPC	Plan and prepare for team meeting on Thurs. 4/23.	B110	0.2
4/23/2020	SMT	Emailled Executive Attorney Service regarding re-service of Deutsche Bank Private Banking and Investment Banking Investment and attaching updated subpoena for service.	B120	0.3
4/23/2020	SMT	Reviewed emails from Executive Attorney Service regarding previous service to Deutsche Bank Private Banking and Investment Banking Investment and re-service of same.	B120	0.4
4/23/2020	SMT	Added affidavit of service to subpoena to file.	B120	0.3
4/23/2020	ADC	Telephone conversation with Sears team to discuss.	B110	0.5
4/23/2020	DJM	Follow up with Goldman Sachs regarding subpoena (0.1); follow up regarding service of Deutsche Bank (0.1); e-mails with counsel to Jefferies (0.1); updating of chart and circulating to counsel (0.2)	B120	0.5
4/23/2020	DJM	Weekly team call.	B110	0.5
4/23/2020	TAB	Prepare for hearing by reviewing all previously filed applications and supporting documents.	B160	1.2
4/23/2020	TAB	Review and revise 'Talking Points' for hearing prep.	B160	0.5
4/23/2020	TAB	Participate on hearing regarding retention	B160	4.0
4/23/2020	TAB	Prepare for and participate on Team weekly call to update.	B110	0.5
4/23/2020	VJ	Telephone conversation with Courtroom Clerk regarding Sears Conference.	B160	0.2
4/23/2020	VJ	Video meeting with Team.	B110	0.5
4/23/2020	JPC	Appear and attend omnibus hearing.	B160	4.0
4/23/2020	JPC	Attend and lead team meeting re: status and tasks w/ T. Berkowitz, D. Marlow, T. Driscoll, A. Corey an V. Jankowski.	B110	0.5
4/23/2020	TAD	Prepare for and attend status call with Sears team.	B110	0.5
4/23/2020	SMT	Emailled D. Marlow regarding service upon Legal & General Investment Management Limited.	B120	0.2
4/23/2020	DJM	Review of timekeeping procedures and updating of time entries to conform to required procedures.	B160	0.5

	Review and analysis regarding potential claims (1.8); review of production by Sculptor (0.5); call with D. Chapman and M. Young of Akin Gump and J. Chou regarding status; next steps (0.4); research regarding potential service of HSBC, e-mail with S. Thomas regarding same (0.3); follow up with TIAA (0.1); updating of status chart (0.1).	B120	3.2
4/24/2020 DJM		B120	0.4
4/24/2020 SMT	Draft/revise subpoena to HSBC Global Asset Management UK Ltd. for service.	B120	0.2
4/24/2020 JPC	T/c w/ D. Marlow in preparation for call with main counsel.	B120	0.3
4/24/2020 JPC	Conference call w/ Akin team re: status of subpoenas, productions, and next steps.	B160	1.0
4/24/2020 TAD	Review billing reports and schedules for first combined monthly fee statement (0.8); review Akin email re: same (0.2).	B160	0.5
4/24/2020 TAD	Correspond with Michelle Cimmino and V Jankowski re: time sheets and fee statement.	B160	1.5
4/24/2020 VJ	Revise monthly fee statement and add time entries and disbursements and forward to TAD.	B120	0.3
4/27/2020 SMT	Added affidavit of service to subpoena to file.	B120	0.2
4/27/2020 SMT	Emailed Executive Attorney Service attaching subpoena and exhibit A for service.		
	Call with counsel to Barclays (0.4); call with counsel to Jefferies, follow up e-mail (0.5); follow up with UBS (0.1); follow up with Wolverine (0.1); updating of chart (0.1).	B120	1.2
4/27/2020 DJM		B120	0.5
4/27/2020 SMT	Separated PDF file of affidavits of service from Executive Attorney Service (0.3); filed same in case file (0.2).	B120	3.3
4/27/2020 ADC	Research & Analysis of Norges latest objection to subpoena (2.5); drafted email to J. Chou regarding findings (0.8).	B120	0.6
4/27/2020 JPC	Review and analyze A. Corey's additional research findings re: FSIA immunity and subpoenas.	B120	0.9
4/27/2020 JPC	Review and analyze case law re: FSIA and service from A. Corey.	B120	0.1
4/27/2020 JPC	Emails w/ A. Corey re: analysis.		
4/28/2020 ADC	Research & Analysis of case law to rebut Norges latest subpoena objection (2.0); drafted email to J. Chou discussing findings (1.1).	B120	3.1
	Separated PDF file of affidavits of service from Executive Attorney Service (1.0); filed same in case file (0.2); added responsive production document to the file (0.9).	B120	2.1
4/28/2020 SMT			
	Review and analysis of production by Sculptor, coordination of saving same to the system (0.8); e-mailing with Akin Gump and counsel for Equitable regarding subpoena (0.4); coordination with Akin Gump regarding productions by subpoena parties (0.8); coordination with S. Thomas regarding service issues (0.2); updating of chart (0.1).	B120	2.3
4/28/2020 DJM		B160	0.2
4/28/2020 VJ	Telephone conversation with TAD regarding status of Retention Order and Fee Application.		
	Further analysis of case law (1.2); perform follow-up analysis of service issues (1.1); emails w/ A. Corey re: same (0.6); review productions from subpoenaed parties (0.6).	B120	3.5
4/28/2020 JPC		B120	0.3
4/28/2020 DCA	Assist in converting .csv file for production.		
	Follow up with Societe Generale, e-mails with same (0.2); follow up with Comerica (0.1); follow up with Merrill Lynch (0.1); review of response and production by TIAA (0.5); updating of chart (0.1); e-mails with Akin Gump regarding analysis of information produced by subpoena respondents (0.3); time entry (0.2).	B120	1.5
4/29/2020 DJM		B120	0.3
4/29/2020 SMT	Added responsive production document to the file.	B120	0.5
4/29/2020 JPC	Attention to production.	B120	1.0
4/29/2020 JPC	Further analysis of foreign state service and possible exceptions.	B120	0.9
4/30/2020 DJM	Review of template for shareholder data from Akin Gump (0.4); e-mails regarding same (0.5).	B110	0.3
4/30/2020 ADC	Telephone conversation with Sears team to discuss latest case developments.	B110	0.3
4/30/2020 JPC	Weekly team meeting.	B120	0.1
4/30/2020 JPC	Review and respond to email from D. Marlow re: maintaining information produced by subpoenaed parties.	B120	1.0
4/30/2020 JPC	Further review case law.	B120	1.0
4/30/2020 JPC	Further review of information relevant to Norges Bank.	B120	0.4
4/30/2020 JPC	Review additional production materials.	B110	0.3
4/30/2020 VJ	Webex with team for update on status of matter.		

4/30/2020	SMT	Added responsive production document to the file.	B120	0.3
4/30/2020	TAD	Status call with J. Chou, D. Marlow and T. Berkowitz.	B110	0.4
4/30/2020	TAD	Draft/revise monthly fee statement.	B160	1.0
4/30/2020	DJM	Weekly team meeting and preparation for same.	B110	0.5
			TOTAL:	144.0



MORITT HOCK & HAMROFF LLP
INVOICE DATED JUNE 2020

File # N-1994.001
Re: Sears
Bankruptcy

Date	Prof	Description	Task	Time
5/1/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	3.1
5/1/2020	TAD	Draft, revise first combined monthly fee statement (1.0), revise exhibits thereto (0.8)	B160	1.8
5/1/2020	DJM	Call with S. Thomas regarding analysis of shareholder data obtained in response to subpoenas (0.4); additional call with S. Thomas regarding questions (0.4).	B120	0.8
5/1/2020	TAD	Correspond with timekeepers re: first combined monthly fee statement.	B160	0.2
5/1/2020	SMT	Allocation of time to tasks for fee statement.	B160	0.1
5/1/2020	DJM	Revision of billing descriptions for monthly fee statement.	B160	0.3
5/1/2020	JPC	Begin review and comments to First Combined Monthly Fee Statement.	B160	0.5
5/4/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	2.8
5/4/2020	DJM	Analysis and provision of information to D. Chapman in connection with client update (1.3); detailed review of information produced to date in response to subpoenas and follow up with multiple parties regarding deficiencies (2.0); call with S. Thomas regarding analysis and preparation of chart of information produced by subpoena respondents (0.6); e-mails with Akin Gump regarding non-complying parties (0.4).	B120	4.3
5/4/2020	JPC	Review updated chart and info re: status of subpoenas and responses (.1); emails from D. Marlow re: same (.2).	B120	0.3
5/4/2020	SMT	Telephone call with D. Marlow regarding analysis and preparation of chart of information produced by subpoena respondents.	B120	0.4
5/4/2020	SMT	Further conforming billing descriptions and time allocations for fee statement.	B160	0.2
5/5/2020	JPC	Review of draft First Combined Monthly Fee statement and provide comments.	B160	1.4
5/5/2020	DJM	Review and analysis of productions received to date (1.8); e-mails with various banks (Alliance Bernstein, Citibank, Nomura, Sculptor, CSS) regarding production deficiencies/clarifications (1.2); e-mail to Jefferies in response to objections (0.6); coordination with S. Thomas regarding data analysis, template (0.4).	B120	4.0

5/5/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	2.4
5/5/2020	SMT	Conforming time entry descriptions for fee statement.	B160	0.1
5/6/2020	DJM	E-mails with counsel to Morgan Stanley regarding motion for 2004 discovery, review of docket in connection with same (0.8); call with counsel for Merrill Lynch regarding subpoena (0.4); e-mails with counsel for Highland Counsel regarding subpoena (0.4); various follow up e-mails and requests for status updates from multiple banks (0.8); coordination with S. Thomas regarding information analysis and creation of template, service issues (0.5)	B120	3.0
5/6/2020	SMT	Revising and conforming descriptions for fee statement.	B160	0.2
5/6/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	3.3
5/6/2020	TAD	Review J. Chou correspondence and comments to first fee statement and correspond with billing re: same.	B160	0.5
5/6/2020	DJM	Time entry descriptions and time allocations.	B120	0.5
5/6/2020	SMT	Telephone calls to Registered Agent of Wells Fargo Securities LLC regarding contact information for the Legal Department regarding served subpoena (0.4); telephone call Wells Fargo Securities LLC concerning same (0.3).	B120	0.7
5/7/2020	DJM	Draft/revise spreadsheet of information from subpoenaed parties (0.8); call with S. Thomas regarding spreadsheet analysis (0.3); review of supplemental production by TIAA and e-mail to S. Thomas regarding same (0.4); provision of information to S. Thomas for inclusion in spreadsheet (0.5); e-mails with Akin Gump and FTI regarding Highland Capital (0.3).	B120	2.3
5/7/2020	VJ	Revise Fee Application.	B160	0.8
5/7/2020	ADC	Communicate (in firm) to discuss subpoena status with team (0.20); call with J. Chou to discuss Norges meet and confer (0.40); researched case law and legislative history w/r/t Norges service argument (1.50)	B120	2.1
5/7/2020	SMT	Conforming time entry descriptions and time allocations for fee statement.	B160	0.2
5/7/2020	TAB	Attend weekly team status meeting	B110	0.2
5/7/2020	TAD	Calls with Sears team re: status, fee statement and related items.	B160	0.3
5/7/2020	JPC	T/c w/ A. Corey re: final research point and strategy for meet and confer w/ Norges Bank (.4); review research findings from A. Corey (.6); correspond w/ A. Corey re: same (.2).	B120	1.2
5/7/2020	DJM	Weekly team call.	B110	0.2
5/7/2020	VJ	Weekly Webex with team.	B110	0.2
5/7/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	2.2

5/7/2020	DJM	Revise descriptions and assign time allocations to conform w/BK billing standards.	B160	0.3
5/7/2020	JPC	Prepare agenda for weekly team meeting (.1); attend and facilitate team meeting (.2).	B110	0.3
5/7/2020	SMT	Added documents responsive to subpoena to file.	B120	0.2
5/8/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	2.2
5/8/2020	TAD	Correspond with V. Jankowski re: revisions to first monthly fee statement.	B160	0.1
5/8/2020	SMT	Time entry descriptions for fee statement.	B160	0.2
5/8/2020	SMT	Added documents responsive to subpoena to file.	B120	0.4
5/8/2020	TAD	Revise pre-bill with J. Chou edits and correspond with accounting re: same.	B160	0.5
5/8/2020	VJ	Revise Fee Application and email to TAD.	B160	2.6
5/11/2020	TAD	Review first combined fee statement (.70); review interim comp. order re: notice procedures and other requirements.	B160	1.2
5/11/2020	JPC	Review and comment on billing descriptions for April 2020; draft billing protocol email to MHH team.	B120	2.0
5/11/2020	SMT	Conforming time entry descriptions for fee statement.	B160	0.2
5/11/2020	SMT	Telephone call with D. Marlow regarding entry into shareholders chart of select information contained in Citibank's production documents.	B120	0.4
5/11/2020	DJM	Call/e-mails with counsel for Jefferies regarding subpoena (0.5); e-mails with Akin Gump regarding same (0.5); call with S. Thomas regarding analysis of production by Citibank (0.3); coordination with S. Thomas regarding Jefferies production (0.1); review of e-mail from Comerica and addressing of same (0.3).	B120	1.7
5/11/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	1.8
5/12/2020	DJM	Review and analysis of production by AQR (0.5); review and analysis of production by Comerica (0.5), review and analysis of production by Sculptor (0.5); call and e-mails with S. Thomas regarding productions, inputting to template (0.4); e-mails with counsel for UBS (0.1); e-mails with counsel for Wolverine (0.1); updating of chart (0.3)	B120	2.4
5/12/2020	SMT	Further revise descriptions and allocations for next monthly fee statement.	B160	0.1
5/12/2020	TAD	Review time records to be annexed to first combined monthly fee statement (.60); correspond with M. Cimmino and V. Jankowski re: same (.50); correspond with J. Chou re: revised statement for filing (.10).	B160	1.2
5/12/2020	JPC	Review final monthly fee statement for filing (.4); email to T. Driscoll and V. Jankowski re: same (.1).	B160	0.5

5/12/2020	TAD	Revise first combined monthly fee statement.	B160	1.0
5/12/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	2.4
5/12/2020	SMT	Telephone call with D. Marlow regarding entry into shareholders chart of select information contained in Comerica, Sculptor/Och-Ziff and AQR production documents.	B120	0.5
5/13/2020	TAD	Multiple emails and calls with V. Jankowski re: filing and service of monthly fee statement.	B110	0.6
5/13/2020	TAD	Revise and finalize first combined monthly fee statement for filing and service.	B160	1.4
5/13/2020	DJM	Time entry descriptions for monthly fee statement.	B160	0.4
5/13/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	2.7
5/13/2020	SMT	Revise time entry descriptions for monthly fee statement.	B160	0.1
5/13/2020	DJM	Call with counsel for UBS (0.4); call with counsel for Wolverine (0.4); review of data analysis template from S. Thomas and e-mails with same (0.4).	B120	1.2
5/13/2020	VJ	Discuss and finalize First Combined Monthly Fee Application with TAD and SS (.8); e-file Combined Monthly Fee Application and email to all noticed parties (.5); download and save document (.1).	B160	1.4
5/13/2020	SMT	Added documents responsive to subpoena to file.	B120	0.4
5/14/2020	SMT	Telephone call and email with D. Marlow regarding analysis and preparation of chart of information produced by subpoena respondents.	B120	0.6
5/14/2020	ADC	Attend weekly team meeting.	B110	0.2
5/14/2020	DJM	Weekly team meeting.	B110	0.2
5/14/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	2.8
5/14/2020	VJ	Weekly status meeting with team.	B110	0.2
5/14/2020	TAB	Attend weekly team meeting	B110	0.2
5/14/2020	DJM	E-mail with counsel for Barclays (0.1 hour); e-mail with counsel for BlackRock (0.1); review of information from Comerica and call/e-mails with S. Thomas regarding analysis of same (0.6); revisions to time entries to conform/standardize (0.4).	B120	1.2
5/14/2020	JPC	Attention to January through April fees and expenses for client budgeting purposes.	B160	1.0
5/14/2020	TAD	Review pre-bill for April time.	B160	0.8
5/14/2020	JPC	Weekly team meeting re: status of tasks and updates.	B110	0.2

5/14/2020	SMT	Conforming descriptions and tasks for monthly fee statements.	B160	0.1
5/15/2020	SMT	Revising descriptions and allocations and addition of BK task codes for monthly statement.	B160	0.1
5/15/2020	JPC	Review revised time descriptions for monthly fee statement (.2); email same with comment to T. Driscoll and V. Jankowski for monthly fee statement (.1).	B160	0.3
5/15/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	1.4
5/15/2020	VJ	Telephone conversation with SMT regarding using B codes for billing.	B110	0.2
5/18/2020	DJM	E-mails with various banks following up on subpoena responses (0.5 hours)	B120	0.5
5/18/2020	SMT	Emailed D. Marlow attaching updated Shareholders chart for review.	B120	0.2
5/18/2020	SMT	Coding and billing descriptions for monthly fee statement.	B160	0.2
5/18/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	1.9
5/19/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	1.8
5/19/2020	DJM	Draft/revise chart analyzing public shareholder data, e-mails with S. Thomas regarding same.	B120	0.5
5/19/2020	SMT	Draft/revise shareholders chart.	B120	0.2
5/19/2020	SMT	Edit time entry descriptions and codes for monthly statement.	B160	0.2
5/19/2020	TAD	Review edits to April time (0.3); multiple emails with M. Cimmino re: April time and bankruptcy codes.	B160	0.6
5/19/2020	TAD	Review docket for professional interim fee application timing.	B160	0.3
5/20/2020	TAD	Review and edit April pre-bill, bankruptcy codes.	B160	0.8
5/20/2020	ADC	Telephone conversation with D. Marlow discussing Norges Bank call strategy	B120	0.4
5/20/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis	B120	1.2
5/20/2020	SMT	Time entry recording descriptions and allocations for fee statement.	B160	0.2
5/20/2020	DJM	Review and analysis of correspondence and legal research related to objections by Norges bank (1.5); call with A. Corey regarding objections by Norges bank (0.5); e-mails with counsel for Norges bank (0.3); review of production from Societe Generale and e-mails with S. Thomas regarding same (0.5)	B120	2.8
5/20/2020	DJM	Conform descriptions and allocation for monthly fee statement.	B120	0.2
5/20/2020	SMT	Added documents responsive to subpoena to file.	B120	0.2

5/21/2020	DJM	Time entry, revision to time entries for monthly fee statements.	B160	0.6
5/21/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	1.6
5/21/2020	TAD	Correspond with James Chou re: fee statement; matter designations and related items (0.3); discuss same with V. Jankowski (0.2)	B160	0.5
5/21/2020	DJM	Preparation for and conduct of call with counsel for Norges Bank, call with A. Corey in connection with same (1.2); follow up e-mail with counsel for Norges Bank (0.4); coordination with S. Thomas regarding entry of data for Norges on spreadsheet, review of FTI data in connection with same (0.5); review and sending of spreadsheet to Akin Gump, e-mails with same (0.5).	B120	3.4
5/21/2020	TAB	Prepare for and participate on Sears team call.	B110	0.3
5/21/2020	VJ	Webex meeting with team.	B110	0.3
5/21/2020	SMT	Time entry descriptions for monthly fee statement.	B160	0.1
5/21/2020	TAD	Review revised billing summary for compliance with UST guidelines and local rules, orders.	B160	0.7
5/21/2020	ADC	Telephone conversation with team to discuss current status of matter.	B110	0.3
5/21/2020	JPC	Prepare agenda for team meeting (.2); attend team meeting (.3).	B110	0.5
5/21/2020	ADC	Telephone conversation with D. Marlow and then Norges concerning Norges' objections to our subpoena.	B120	0.6
5/21/2020	DJM	Weekly team meeting.	B110	0.3
5/21/2020	JPC	Review and edit matter descriptions and task codes for monthly billing statement.	B160	0.3
5/22/2020	DJM	E-mails with Blackstone regarding supplemental production.	B120	0.2
5/22/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	1.9
5/22/2020	DJM	Review and analysis of supplemental production from Blackstone.	B120	0.5
5/22/2020	SMT	Time entry recording.	B160	0.1
5/25/2020	DJM	Draft/revise spreadsheet analyzing public shareholder data, e-mails with S. Thomas regarding same.	B120	0.5
5/26/2020	TAD	Review time records for conformity with designations of billing codes and UST guidelines.	B160	0.4
5/26/2020	SMT	Time entry description and allocations.	B160	0.1
5/26/2020	DJM	Review of spreadsheet analyzing public shareholder data (0.3); call with S. Thomas regarding same (0.4); e-mail to Akin Gump regarding same (0.1); follow up with numerous banks regarding production (0.2).	B120	1.0

5/26/2020	SMT	Telephone call with D. Marlow regarding information contained in Shareholder chart.	B160	0.3
5/26/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	0.9
5/26/2020	TAD	Emails with James Chou re: designation of bankruptcy billing codes for April fee statement.	B160	0.2
5/27/2020	TAD	Further edits to April time (0.7); correspond with M. Cimmino re: same (0.1); correspond with V. Jankowski re: fee statement (0.1)	B160	0.9
5/27/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	1.3
5/27/2020	SMT	Conform billing descriptions and allocations for next fee statement.	B160	0.1
5/27/2020	DJM	E-mails with counsel for Blackstone (0.5), provision of productions as requested by Akin Gump (0.5).	B120	1.0
5/28/2020	TAD	Review interim comp procedures order re: process following objection deadline and related items.	B160	0.4
5/28/2020	ADC	Weekly Sears team meeting to discuss weekly developments.	B110	0.3
5/28/2020	SMT	Conforming descriptions for monthly fee statement.	B160	0.2
5/28/2020	TAD	Team meeting to discuss status and progress of various items.	B110	0.3
5/28/2020	DJM	Attend weekly team meeting.	B110	0.3
5/28/2020	DJM	Time entry and review descriptions and time allocations.	B160	0.4
5/28/2020	SMT	Emailed D. Marlow attaching shareholders chart for review and input.	B120	0.2
5/28/2020	VJ	Draft April Fee Statement.	B160	2.5
5/28/2020	DJM	Follow up with numerous banks regarding response to subpoena (0.5); e-mails with counsel to Wolverine regarding subpoena (0.1); research regarding contacts at HSBC and e-mailing of same regarding subpoena (0.5); e-mails with S. Thomas regarding service, analysis of public shareholder data (0.3); review of public shareholders chart from S. Thomas and e-mailing of comments to same (0.4); updating of service chart (0.2).	B120	2.0
5/28/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	3.3
5/28/2020	VJ	Status call with team.	B110	0.3
5/28/2020	JPC	Weekly team meeting.	B110	0.3
5/28/2020	TAB	Weekly call with Sears Team.	B110	0.3
5/28/2020	VJ	Prepare Notice of Appearance for JPC.	B110	0.6

5/28/2020	TAD	Call with Zach Lainer (Akin) re: interim fee applications and timing for next round (0.1); call with V. Jankowski re: April fee statement (0.1).	B160	0.2
5/29/2020	SMT	Emailed D. Marlow attaching revised shareholders chart for review.	B120	0.2
5/29/2020	VJ	E-file Notice of Appearance for JPC.	B110	0.3
5/29/2020	DJM	Draft/revise spreadsheet analyzing public shareholder data, multiple e-mails with S. Thomas regarding same (0.8); e-mailing of same to Akin Gump (0.2); e-mail to Akin Gump regarding outstanding subpoenas (0.4); e-mails with counsel to Goldman Sachs (0.1).	B120	1.5
5/29/2020	SMT	Further conform descriptions and time allocations for monthly fee statement.	B160	0.1
5/29/2020	SMT	Revised shareholders chart for further review and analysis.	B120	2.2
5/29/2020	TAD	Work on Second Monthly Fee Statement.	B160	0.7
5/29/2020	TAD	Review comp. procedures and correspond with Debtors' restructuring advisors (M-III Partners) for payment on First Monthly Fee Statement.	B160	0.4
			Total:	128.6



MORITT HOCK & HAMROFF LLP
INVOICE DATED JULY 2020

File # N-1944.001 Re: Sears Bankruptcy

Date	Prof	Narrative	Task Code	Time
6/1/2020	DJM	E-mails/calls with counsel for Merrill Lynch (0.5); follow up with S. Thomas regarding service issues (0.3).	B120	0.8
6/1/2020	SMT	Updates to subpoena service tracking chart.	B120	0.8
6/1/2020	SMT	Emailed Executive Attorney Service regarding status of outstanding subpoenas and instructions for re-service.	B120	0.4
6/1/2020	JPC	Review and comment on draft second monthly fee statement, including time entries.	B160	1.0
6/1/2020	JPC	Review revised monthly fee statement and approve for filing.	B160	0.2
6/1/2020	TAD	Work on Second Monthly Fee Statement.	B160	1.4
6/1/2020	TAD	Correspond with V. Jankowski, M. Cimmino, J. Chou re: Second Monthly Fee Statement (.40); correspond with MHI Partners re: W-9 and follow re: same (.10).	B160	0.5
6/2/2020	VJ	Finalize and e-file Second Month Fee Statement; download and save filed copy and email to service parties.	B160	0.8
6/2/2020	SMT	Attention to resolution of process server issues.	B120	0.1
6/2/2020	TAD	Draft, revise and finalize Second Monthly Fee Statement.	B160	1.4
6/2/2020	TAD	Correspond with V. Jankowski re: filing and service of Second Monthly Fee Statement.	B160	0.2
6/3/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis. (0.3) Emailed D. Marlow attaching updated shareholders chart. (0.1)	B120	0.4
6/3/2020	DJM	Call with Goldman Sachs (0.4); e-mails with Goldman Sachs and Akin Gump to follow up (0.3); review of production from Wolverine (0.4); e-mails with S. Thomas regarding incorporation of Wolverine production into public shareholder data analysis (0.4).	B120	1.5
6/4/2020	DJM	E-mail to Akin Gump regarding status of various subpoena responses (0.3); review of spreadsheet, data analysis in connection with same (0.5), e-mails with counsel for Morgan Stanley (0.1 hours).	B120	0.9
6/4/2020	SMT	Reviewed and updates to subpoena service tracking chart.	B120	0.7
6/5/2020	DJM	Call with counsel to Morgan Stanley (0.3); e-mails with Akin Gump regarding productions by Alliance Bernstein (0.2); e-mails regarding production by Sumitomo (0.3), e-mails with Akin Gump regarding production by Invesco (0.4 hours), e-mails with Akin Gump regarding production by Citibank (0.4)	B120	1.6
6/5/2020	JPC	Review month of May time entries, descriptions and time allocations in preparation for report for monthly fee statement.	B160	0.6
6/6/2020	DJM	E-mails with M. Young regarding Comerica production.	B120	0.3
6/8/2020	SMT	Reviewed and updates to subpoena service tracking chart.	B120	0.5
6/11/2020	ADC	Communicate (in firm) - attended weekly teleconference	B110	0.3
6/11/2020	DJM	Attend weekly team meeting.	B110	0.3

6/11/2020	VJ	Status conference call with team.	B110	0.3
6/11/2020	TAD	Team status call.	B110	0.3
6/11/2020	TAD	Review status of objections on Second Monthly Fee Statement (.10); review correspondence from MIII Partners re: payment of First Monthly Fee Statement (.20).	B160	0.3
6/11/2020	JPC	Prepare for and attend weekly team meeting.	B160	0.3
6/12/2020	SMT	Process Barclay's production documents.	B120	0.4
6/12/2020	DJM	Review of production from Barclays (0.5); e-mails with IT, S. Thomas, counsel regarding Barclays production (0.4); e-mails with Akin Gump regarding status, next steps (0.3)	B120	1.2
6/15/2020	DJM	Call with counsel for Barclays regarding production (0.4); review of Barclays production and follow up e-mail (0.2), call with S. Thomas regarding analysis and inputting of Barclays production. (0.3)	B120	0.9
6/15/2020	SMT	Reviewed produced records for inputting select shareholder information into shareholders chart for further review and analysis.	B120	0.4
6/15/2020	SMT	Telephone call (0.1) and review regarding new document production for analysis and input with D. Marlow. (0.2)	B191	0.3
6/15/2020	JPC	Attention to additional third parties to subpoena and conflicts.	B110	0.5
6/16/2020	DJM	E-mails with Akin Gump regarding analysis of data received from subpoenaed parties.	B120	0.3
6/16/2020	SMT	Reviewed produced records for inputting select shareholder information into shareholders chart for further review and analysis.	B120	1.1
6/16/2020	TAD	Review M-III Partners inquiries re: accruals and forecasts and follow in estate fees (.30); follow with billing re: accruals (.10); review reports re: same (.50); review and compile estate fee numbers from filed April statement (.40).	B160	1.3
6/16/2020	TAD	Emails with James Chou re: M-III Partners email re: accruals and forecasts and proposed responses thereto.	B160	0.6
6/16/2020	JPC	Review email correspondence re: discrepancies between DTC data and data supplied by third parties.	B120	0.1
6/16/2020	JPC	Review email correspondence from T. Driscoll re: M-III Partners' request for budgeting and forecasting information.	B110	0.2
6/16/2020	JPC	Attention to May 2020 fees to supply to Akin for budgeting purposes.	B110	0.2
6/17/2020	DJM	Review and analysis of Barclays data as input by S. Thomas, e-mail to Thomas regarding same.	B120	0.3
6/17/2020	SMT	Reviewed produced records inputting select shareholder information into shareholders chart for further review and analysis.	B120	1.8
6/17/2020	JPC	Review and make edits to latest May 2020 billing statement for monthly fee statement.	B160	1.5
6/18/2020	ADC	Attend meeting with Sears team.	B110	0.3
6/18/2020	DJM	Weekly team meeting.	B110	0.3
6/18/2020	DJM	Review and analysis of public shareholder data (0.9); follow up with various subpoena respondents regarding data inconsistencies (0.8); analysis of Comerica data, e-mails with S. Thomas regarding same (0.7); follow up with multiple banks regarding subpoena productions (0.5), e-mails with S. Thomas regarding service of additional subpoenas (0.3).	B120	3.2
6/18/2020	VJ	Draft Third Fee Statement for May 2020 and forward to TAD for review.	B160	2.3
6/18/2020	VJ	Weekly team conference.	B110	0.3

6/18/2020	JPC	Review revised draft of billing statement from accounting (.3); email with accounting department re: additional revisions (.2).	B160	0.6
6/18/2020	JPC	Prepare agenda for weekly meeting (.2); facilitate weekly meeting (.3).	B110	0.5
6/18/2020	JPC	Emails a re: conflicts clearance for additional parties and potential defendants (.2); t/c w/ conflicts check staff re: same. (.1).	B110	0.3
6/18/2020	TAD	Attend Sears team status call.	B110	0.3
6/19/2020	SMT	Draft additional subpoenas to various entities (3.8). Draft emails to Executive Attorney Service attaching additional subpoenas for service (0.4)	B120	4.2
6/19/2020	DJM	Additional review of DTC data (0.3); e-mails with S. Thomas regarding additional subpoenas (0.3).	B120	0.6
6/19/2020	VJ	Emails with TAD regarding second fee application payment.	B110	0.2
6/19/2020	TAD	Correspond with James Chou re: M-III request, call with Akin (.10); emails with Zach Lanier re: same (.10); correspond with M-III Partners re: Second Monthly Fee Statement and payment (.20); email and call with V. Jankowski re: same (.10).	B160	0.5
6/19/2020	JPC	Attention to conflicts for new subpoenaed parties (.1); confer w/ D. Marlowe re: same (.1).	B160	0.2
6/22/2020	DJM	Draft/revise budget for future adversary proceeding related work.	B110	0.5
6/22/2020	DJM	Analysis of productions regarding public shareholder data as compared to other sources (1.2); e-mails to subpoenaed parties to follow up on outstanding issues with productions (0.8); e-mails with S. Thomas regarding shareholder data (0.3); research regarding locations and contact information for additional subpoena targets (1.2).	B120	3.5
6/22/2020	SMT	Updates to subpoena service tracking chart (0.3); analysis of documents production containing shareholder information from Comerica for updates to chart (.8). Emails and telephone call to Executive Attorney Service regarding service of subpoenas and attaching same. (0.7) Emailed D. Marlow regarding service of subpoenas and email attaching updated shareholders chart for review and input. (0.6) Draft and revised additional subpoenas to various entities. (0.9)	B120	3.3
6/22/2020	TAD	Call with James Chou and Zach Lanier re: professional fees, budget and M-III Partners request.	B160	0.3
6/22/2020	JPC	Conf. call w/ T. Driscoll and Z. Lanier (Akin).	B160	0.2
6/22/2020	JPC	Follow up re: conflicts check on additional parties.	B160	0.3
6/23/2020	DJM	E-mails with counsel for Barclays regarding follow up questions, supplemental production.	B120	0.4
6/23/2020	TAD	Review draft of Third Monthly Fee Statement (0.4) and initial edits e: same.	B160	0.7
6/23/2020	SMT	Analysis of documents production containing shareholder information from various.	B120	1.2
6/25/2020	DJM	Review and analysis of lists of additional subpoena targets from Akin Gump, e-mails with S. Thomas regarding same, issuing of subpoenas (0.7); e-mails with multiple subpoena targets yet to produce regarding status (0.6), e-mails with counsel for Barclays regarding follow up issues (0.2).	B120	1.5
6/25/2020	VJ	Telephone conversation with TAD to discuss Third Fee Application.	B110	0.3
6/25/2020	VJ	Revise Exhibit C and finalize Third Fee Statement; email to JPC and TAD for approval to file.	B160	0.5
6/25/2020	SMT	Emails and telephone call to Executive Attorney Service regarding additional service of subpoenas and attaching same. (0.5) Draft and revised additional subpoenas to various entities for service. (1.7) Emailed D. Marlow regarding service of subpoenas and attaching updated shareholders chart for review and input. (0.2)	B120	2.4
6/25/2020	TAD	Revise Third Monthly Fee Statement (.70); correspond with V. Jankowski re: filing and service of same (.30).	B160	1.0

6/26/2020	DJM	Multiple e-mails with S. Thomas regarding service of additional subpoenas (0.6); follow up with various banks regarding status of production (0.2).	B120	0.8
6/26/2020	SMT	Emails to Executive Attorney Service regarding additional service of subpoenas and attaching same. (0.6) Draft and revised additional subpoena for service (.4); updates to subpoena service tracking chart (0.4).	B120	1.4
6/26/2020	JPC	Review draft monthly fee statement.	B160	0.3
6/26/2020	VJ	Finalize Third Fee Statement and e-file; forward copy of Third Fee Statement to service parties and TAD, JPC and TAB.	B160	0.7
6/29/2020	DJM	E-mails and call with counsel from TD Waterhouse regarding subpoena response (0.4), e-mails with S. Thomas regarding service issues (0.2); e-mails with counsel for Goldman Sachs (0.1).	B120	0.7
6/29/2020	SMT	Email to Executive Attorney Service attaching subpoena for service.	B120	0.3
6/29/2020	SMT	Draft and revised additional subpoena for service (.6); updates to subpoena service tracking chart (0.4) Emailed D. Marlow regarding service of subpoena. (0.2)	B120	1.2
6/30/2020	VJ	Download and convert sample fee application in order to prepare Fee Application.	B110	0.4
			Total:	62.70



MORITT HOCK & HAMROFF LLP
INVOICE DATED AUGUST 2020
File # N-1944.001 Re: Sears Bankruptcy

Date	Prof	Narrative	Task Code	Time
7/1/2020	DJM	E-mails with counsel for UBS, IT regarding production (0.4); e-mails with counsel for Citibank regarding follow up (0.1); follow up with Goldman Sachs and BNY Mellon (0.1); e-mails with S. Thomas regarding service (0.2), e-mails with Akin Gump regarding data analysis (0.2).	B120	1.00
7/1/2020	SMT	Updates to subpoena service tracking chart (0.3); analysis of documents production containing shareholder information from Suimitomo and Investco for updates to chart (1.9).	B120	2.20
7/2/2020	VJ	Weekly team call for updates and status.	B110	0.30
7/2/2020	TAB	Prepare for & participate on Team call re status and action items	B110	0.30
7/2/2020	JPC	Lead weekly team meeting.	B110	0.30
7/2/2020	DJM	Draft/revise service and shareholder charts and sending of same to Akin Gump; e-mails with Blackrock regarding production (2.4); call with Wells Fargo (0.2); e-mails with Goldman Sachs (0.2).	B120	2.80
7/2/2020	DJM	Attend weekly team call.	B110	0.30
7/6/2020	SMT	Emailed to D. Marlow attaching Wells Fargo Clearing Service affidavit of service concerning Wells Fargo's response.	B120	0.20
7/6/2020	DJM	Call with counsel for Fidelity re subpoena (0.2); e-mails with counsel for RBC re subpoena (0.2); e-mails with counsel for UBS regarding production (0.3); call with S. Thomas regarding public shareholder and service charts (0.3).	B120	1.00
7/6/2020	SMT	Updates to subpoena service tracking chart (0.3); analysis of documents production containing shareholder information from Blackstone and Vanguard for updates to chart (1.7).	B120	2.00
7/7/2020	JPC	Analyze and prepare accruals and forecasts for MIII Partners.	B160	2.50
7/7/2020	DJM	Call with counsel to USAA (0.2); e-mail to counsel for USAA regarding protective order, subpoena (0.4).	B120	0.60
7/7/2020	JPC	Review and conform June 2020 billing entries for all timekeepers for monthly statement.	B160	0.60
7/8/2020	SMT	Drafted email to Executive Attorney Service attaching subpoena for service.	B120	0.40
7/8/2020	SMT	Updates to subpoena service tracking chart (0.1); analysis of documents production containing shareholder information from Vanguard and Goldman Sachs for updates to chart (2.4).	B120	2.50
7/8/2020	SMT	Process Goldman Sachs and UBS production documents.	B120	0.60
7/8/2020	SMT	Draft additional subpoenas for service.	B120	0.40
7/8/2020	DJM	Research and analysis of production by Goldman Sachs, accompanying correspondence (0.6); e-mails and call with S. Thomas regarding same (0.4); follow up e-mail to Goldman Sachs regarding same (0.2), e-mail to Akin Gump (0.1).	B120	1.30

7/9/2020	ADC	Telephone conversation with Sears team.	B110	0.20
7/9/2020	DJM	Attend team meeting.	B110	0.20
7/9/2020	JPC	Weekly team meeting re: outstanding tasks and action items.	B110	0.20
7/9/2020	TAB	Prepare for and participate on weekly status call.	B110	0.20
7/9/2020	DJM	Follow up with numerous banks regarding production (0.4); e-mail with Fidelity regarding confidentiality stipulation (0.2); review/revision of service chart (0.1).	B120	0.70
7/9/2020	TAD	Team status call.	B110	0.10
7/10/2020	DJM	Review of UBS production, e-mails with S. Thomas regarding same (0.5); review/revision of public shareholder chart (0.5); review/revision of service chart, e-mails regarding service issues (0.9); review of Morgan Stanley production and e-mail to Morgan Stanley regarding same (0.5).	B120	2.40
7/10/2020	SMT	Emails and telephone call to D. Marlow regarding inputting of information contained in Goldman Sachs production documents.	B120	0.50
7/10/2020	SMT	Analysis of document production containing shareholder information from Goldman Sachs and UBS for updates to chart.	B120	6.40
7/13/2020	DJM	Review/revise aggregate shareholder chart, e-mails with S. Thomas regarding same (1.2); attention to service issues (0.3).	B120	1.50
7/13/2020	SMT	Drafted email Executive Attorney Service attaching subpoena for service.	B120	0.20
7/13/2020	SMT	Draft additional subpoenas for service.	B120	0.30
7/13/2020	SMT	Analysis of document production information contained in shareholder chart (2.1); updates to subpoena service tracking chart (0.3).	B120	2.40
7/14/2020	DJM	Review of materials sent by D. Chapman to committee (0.5); review of recent case decision (1.0); follow up with various banks regarding production (0.3).	B120	1.80
7/14/2020	TAB	Review monthly fee statements issues for JChou (0.2).	B160	0.20
7/14/2020	TAB	Review and comment on email to Akin regarding future litigation arising from corporate transactions (0.1); Review Akin status memo to litigation trust representatives (0.2).	B120	0.30
7/14/2020	JPC	Review and analyze memo from Akin summarizing status of investigation and analysis concerning asserting claims (0.5); analyze relevant case law (0.2).	B120	0.70
7/14/2020	VJ	Review all accounting pre-bill spreadsheets and draft Fourth Fee Statement for June 2020.	B160	2.40
7/15/2020	DJM	Review of memo from Akin Gump (0.3); review of production from U.S. Bankcorp Investments (0.3); e-mails with subpoena respondents (0.2), attention to issues regarding Citibank supplemental production and encryption (0.2).	B120	1.00
7/15/2020	SMT	Analysis of document production information contained in shareholder chart (0.6); updates to subpoena service tracking chart (0.4).	B120	1.00
7/16/2020	TAD	Review and finalize June monthly fee statement.	B160	0.80
7/16/2020	VJ	Weekly team phone call.	B110	0.40
7/16/2020	DJM	Attend weekly team meeting.	B110	0.40

7/16/2020	VJ	Commence drafting of First Interim Fee Application.	B160	1.80
7/16/2020	DJM	Review and analysis of production by Citibank and prior productions and correspondence, e-mails with team regarding same (0.9); e-mails with PNC Bank (0.1); call with Wells Fargo (0.2); review and analysis of e-mail from Clearstream objecting to subpoena, e-mails with team regarding same (0.4), coordination with S. Thomas regarding updates to chart (0.2).	B120	1.80
7/16/2020	JPC	Team meeting to discuss status of fees, projections, and substantive matters re: subpoenas.	B110	0.40
7/16/2020	VJ	Finalize June Invoice and forward Fourth Fee Statement and Invoice to JPC to approve for filing.	B160	0.40
7/16/2020	TAB	Prepare for and participate on weekly Team Call.	B110	0.40
7/16/2020	TAD	Team meeting.	B110	0.40
7/16/2020	TAD	Correspond with V. Jankowski re: June monthly fee statement, interim fee application.	B160	0.20
7/17/2020	JPC	Review draft monthly fee statement and approve for filing	B160	0.60
7/17/2020	JPC	Review and analyze correspondence and arguments from Clearstream Banking re: service under Hague Convention (.2); email w/ D. Marlow re: same (.1).	B120	0.30
7/17/2020	VJ	Continue drafting First Fee Application.	B160	0.80
7/17/2020	VJ	Finalize and e-file Fourth Monthly Fee Statement and forward filed copy to service parties.	B160	0.80
7/17/2020	SMT	Analysis of document production information contained in shareholder chart (1.9); updates to subpoena service tracking chart (0.2).	B120	2.10
7/17/2020	DJM	Research and analysis regarding objections by Clearstream regarding service of subpoena (1.8), drafting and sending of response to Clearstream (0.8), e-mails with A. Corey, J. Chou regarding Clearstream and review of cases sent by same (1.0); review of production by TD Ameritrade, e-mails with S. Thomas regarding same (0.6); e-mails with Akin regarding Citibank production (0.6).	B120	4.80
7/17/2020	SMT	Process TD Ameritrade's production documents.	B120	0.40
7/17/2020	ADC	Research & Analysis of service objections by Clearstream Banking w/r/t the subpoena.	B120	1.60
7/18/2020	JPC	Confer w/TAB re Hague Convention issues (0.2)	B120	0.20
7/18/2020	TAB	Research into Hague Convention service issues; discuss same w/J Chou.	B120	1.00
7/20/2020	VJ	Continue drafting First Interim Fee Application.	B160	1.40
7/20/2020	JPC	Attention to billing issues for M-III Partners.	B160	0.30
7/20/2020	DJM	Review of supplemental correspondence from Goldman Sachs regarding production and e-mail to S. Thomas regarding same (0.3); follow up with Morgan Stanley (0.1).	B120	0.40
7/20/2020	TAD	Correspond and follow up re: payment of Second Monthly Fee Statement.	B160	0.30
7/21/2020	VJ	Continue drafting First Fee Application.	B160	3.70
7/21/2020	SMT	Analysis of document production information contained in shareholder chart (2.6); updates to subpoena service tracking chart (.7).	B120	3.30
7/21/2020	SMT	Process Citibank's production documents.	B120	0.40

7/21/2020	DJM	Call with Citibank (0.3); follow up e-mail to Citibank (0.4); e-mails regarding production by RBC Wealth Management (0.4); e-mails with Akin Gump regarding service of subpoenas (0.4).	B120	1.50
7/22/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	4.40
7/22/2020	JPC	T/c w/ A. Corey re: Clearstream and Hague service issues.	B120	0.10
7/22/2020	DJM	E-mails with JP Morgan regarding subpoena (0.3); e-mails with USAA regarding subpoena (0.2); follow up with various banks (0.3).	B120	0.80
7/23/2020	TAD	Call with Mary Korycki, M-III Partners re: invoices, payments, accruals and related items (.20); follow up emails with Mary Korycki re: same (.20); emails to MHH Sears team re: same (.20).	B160	0.60
7/23/2020	JPC	Attention to Hague service issue re: Clearstream.	B120	0.50
7/23/2020	DJM	Review and analysis of BlackRock production (0.6); follow up with BlackRock regarding production (0.2); call with S. Thomas regarding status, charts, next steps (0.4); e-mails with Wells Fargo regarding protective order (0.2); call with UMB Bank (0.1).	B120	1.50
7/23/2020	ADC	Research & Analysis of Hague Service Convention	B120	0.40
7/23/2020	SMT	Analysis of document production information contained in shareholder chart (4.6); updates to subpoena service tracking chart (0.6).	B120	5.20
7/23/2020	JPC	Email to team re: status and action items.	B110	0.20
7/24/2020	DJM	Review and analysis of UMB production (0.4); review and analysis of production by RBC Wealth Management (0.4); review and analysis of production by National Financial Services (0.4); review/revision of service chart (0.3); e-mailing of multiple subpoenaed parties yet to respond to subpoenas and research of relevant contacts at same (1.5).	B120	3.00
7/24/2020	SMT	Process BlackRock and RBC Wealth Management production documents.	B120	0.40
7/24/2020	VJ	Continue drafting First Fee Application and email draft to TAD.	B160	2.20
7/24/2020	TAD	Revise interim fee application.	B160	0.70
7/24/2020	TAD	Review draft of first interim fee application.	B160	0.30
7/24/2020	SMT	Analysis of document production information contained in shareholder chart (3.4); updates to subpoena service tracking chart (.4).	B120	3.80
7/24/2020	SMT	Drafted email to D. Marlow attaching outstanding subpoenas with Exhibit A and corresponding Affidavits of Service.	B120	0.60
7/27/2020	DJM	Call with S. Thomas regarding analysis of shareholder data (0.4); provision of information to S. Thomas (0.3); e-mails with counsel to Raymond James (0.1).	B120	0.80
7/27/2020	SMT	Analysis of document production information contained in shareholder chart (3.8); updates to subpoena service tracking chart (.3).	B120	4.10
7/27/2020	SMT	Process UMB Bank and National Financial Services LLC (Fidelity) production documents.	B120	0.40
7/28/2020	TAD	Correspond re: payment on third interim fee statement.	B160	0.10
7/28/2020	TAD	Work on first interim fee application.	B160	0.50

7/28/2020	JPC	Review correspondence from Morgan Stanley re: refusal to provide account holder identities (.2); review production from Morgan Stanley.	B120	0.40
7/28/2020	DJM	Review of supplementary response from Morgan Stanley and analysis of same (0.4); e-mail to S. Thomas regarding Morgan Stanley production (0.2), e-mails to Morgan Stanley regarding production (0.2); e-mails with Akin Gump regarding Morgan Stanley production (0.2); e-mails with counsel for Bank of America (0.2); provision of information regarding subpoena responses to Akin Gump (0.5).	B120	1.70
7/28/2020	JPC	Review latest subpoena service and production stats.	B120	0.20
7/29/2020	SMT	Process Morgan Stanley production documents.	B120	0.30
7/29/2020	JPC	Gathering accrual information for M-III partners.	B160	1.00
7/29/2020	DJM	Call with counsel to JP Morgan (0.2); call with counsel to Bank of America and follow up e-mail (0.4); call with S. Thomas regarding production by National Financial Services (0.2).	B120	0.80
7/29/2020	SMT	Analysis of document production information contained in shareholder chart (4.2); updates to subpoena service tracking chart (0.3).	B120	4.50
7/30/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	4.30
7/30/2020	TAD	Review and revise First Interim Fee application.	B160	0.80
7/30/2020	DJM	Response to queries from S. Thomas regarding analysis of shareholder data.	B120	0.40
7/31/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	1.60
				<u>119.50</u>



MORITT HOCK & HAMROFF LLP
INVOICE DATED September, 2020
File # N-1944.001 Re: Sears Bankruptcy

Date	Prof	Narrative	Task Code	Time
8/3/2020	TAD	Emails with Joseph Szydlo re: fee application.	B160	0.1
8/3/2020	VJ	Emails with Accounting Department.	B110	0.2
8/3/2020	DJM	Review and analysis of production by USAA (0.5); e-mail to S. Thomas regarding same (0.2).	B120	0.7
8/3/2020	TAB	Review and analyze Boston Gen case.	B110	0.5
8/3/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	3.3
8/4/2020	TAD	Draft/revise first interim fee application.	B160	1.3
8/4/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	3.2
8/4/2020	JPC	Gather data for M-III Partners.	B160	0.3
8/5/2020	DJM	Review and analysis of Wells Fargo production (0.4); drafting of e-mail to Wells requesting supplemental production (0.4).	B120	0.8
8/5/2020	VJ	Revise First Fee Application with updated payment amounts.	B160	0.4
8/5/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	3.8
8/5/2020	JPC	Email to M-III Partners.	B160	0.1
8/6/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	3.7
8/6/2020	JPC	Team meeting w/ D. Marlow and A. Corey re: status of doc productions service questions, and outstanding issues.	B120	0.3
8/6/2020	ADC	Telephone conversation with team to discuss case developments and subpoena progress.	B120	0.3
8/6/2020	JPC	Review prebill descriptions and time allocations for creation of bill for monthly fee statement.	B160	1.1
8/6/2020	DJM	Weekly team call re: substantive issues re: doc. production.	B120	0.3
8/7/2020	TAD	Revise and finalize draft of first interim fee application.	B160	1.2
8/7/2020	TAD	Email M-III Parties re: Fourth Monthly Fee Statement (0.4); email James Chou re: First Interim Fee Application (0.1).	B160	0.5
8/7/2020	JPC	Review and comment on draft Interim Fee Application.	B160	2.1
8/7/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	1.2
8/9/2020	JPC	Markup time all timekeeper entries to conform with billing practices for Fifth Monthly Fee Statement.	B160	0.8

8/10/2020	TAD	Review JPC comments to first interim fee application (0.2); revise first interim fee application (1.4).	B160	1.6
8/10/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	2.7
8/10/2020	SMT	Processed Wells Fargo Clearing production documents.	B120	0.4
8/10/2020	DJM	E-mails to multiple banks following up on production.	B120	0.6
8/11/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	2.1
8/11/2020	DJM	E-mails with counsel for Citibank and U.S. Bank.	B120	0.2
8/12/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	2.3
8/12/2020	DJM	Call with counsel to PNC Bank, follow up e-mail (0.4); attention to issues related to Pershing production (0.4); e-mails with counsel to U.S. Bank (0.2); review of recent decision related to safe harbor provision (0.5).	B120	1.5
8/12/2020	VJ	Review and revise Fee Application and email to JPC and TAD.	B160	2.6
8/12/2020	VJ	Revise First Interim Fee Application with updated payment numbers and compare to first version and forward to JPC and TAD.	B160	0.8
8/12/2020	JPC	Review weekly billing report and report stats to M-III Partners (.3); Review, comment and revise draft Interim Fee App. (3.0); review and provide comments/revisions on Fifth Monthly Fee Statement. (.5).	B160	3.8
8/12/2020	VJ	Draft Fifth Fee Statement and forward to TAD and JPC.	B160	1.8
8/13/2020	VJ	Conference call with team.	B110	0.3
8/13/2020	VJ	Finalize itemized time run for Fifth Fee Statement.	B160	0.3
8/13/2020	VJ	Review and discuss with TAD changes and revisions to fee application.	B160	0.3
8/13/2020	VJ	Discuss filing of Fee Application with TAD.	B160	0.3
8/13/2020	JPC	Weekly team meeting re: status of fee apps; status of subpoenas and productions; recent case law developments; additional tasks	B110	0.3
8/13/2020	ADC	Attended weekly Sears team meeting.	B120	0.3
8/13/2020	DJM	Weekly team call.	B110	0.3
8/13/2020	TAB	Prepare for and participate on weekly call (joined late).	B110	0.1
8/13/2020	JPC	Review and comment on latest draft of Interim fee app.	B160	0.4
8/13/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	3.3
8/13/2020	ADC	Research & Analysis of the Boston Generating Bankr.SDNY decision and related cases for the sears team's review.	B120	4.2
8/13/2020	TAD	Review and confirm numbers in fee application (1.3); revise First Interim Fee Application (1.2).	B160	2.5

8/13/2020	DJM	Attention to issues related to Citibank and Pershing productions (0.4).	B120	0.4
8/13/2020	TAD	Sears team meeting.	B110	0.3
8/13/2020	TAD	Emails with JPC re: First Interim Fee Application (0.3); discuss changes with V. Jankowski (0.2); email Akin re: service of fee application (0.1).	B160	0.6
8/14/2020	TAD	Multiple emails with J. Chou, V. Jankowski re: fee application (0.3); email Akin re: notice of fee applications (0.2); email Prime Clerk re: service of fee application (0.2).	B160	0.7
8/14/2020	VJ	Emails with TAD and with JPC regarding finalizing Fee Application.	B110	0.3
8/14/2020	TAD	Review and finalize first interim fee application for filing.	B160	2.0
8/14/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	2.7
8/14/2020	VJ	Finalize and e-file First Interim Application for fees and circulate; email copy to Prime Clerk for service.	B160	0.7
8/14/2020	ADC	Draft/revise memo outlining the facts and decision of the In re Boston and related cases for sears team.	B120	1.2
8/14/2020	JPC	Attention to Final Fee App (.7); email w/ T. Driscoll and V. Jankowski re: same (.6).	B160	1.3
8/14/2020	DJM	Review and analysis of Citibank production, e-mail of follow up questions (0.6), coordination with S. Thomas regarding analysis of data (0.2).	B120	0.8
8/17/2020	STB	Arranging for laptop pickup, and discussion regarding system image.	B120	0.5
8/17/2020	DJM	E-mails with counsel to PNC (0.1); e-mails with S. Thomas regarding data analysis (0.1).	B120	0.2
8/17/2020	VJ	Finalize Fifth Fee Statement.	B160	0.4
8/17/2020	ADC	Draft/revise memo re Boston Generating decision and related cases for Sears team.	B120	2.6
8/17/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	1.7
8/17/2020	SMT	Process Citibank production documents.	B120	0.4
8/18/2020	TAD	Review and revise Fifth Monthly Fee Statement.	B160	0.8
8/18/2020	SMT	Process Citibank's and Pershing production documents.	B120	0.5
8/18/2020	SMT	Telephone call with D. Marlow regarding Citibank document production and status of review.	B191	0.5
8/18/2020	JPC	Review billing data and report accrual information to M-III Partners.	B160	1.0
8/18/2020	JPC	Review information data concerning subpoenas and responses.	B120	0.2
8/18/2020	STB	Discussions regarding eDiscovery and the acquiring of safe acquisition of digital files for litigation; arranging for laptops re same.	B120	1.3
8/18/2020	SMT	Analysis of document production information contained in shareholder chart (2.6); updates to Subpoena Service chart (0.4).	B120	3.0

8/18/2020	DJM	Review and analysis of Pershing production (0.4); call with S. Thomas regarding analysis of Citibank production (0.3); e-mail to M. Young of Akin regarding status of subpoenas (0.5); follow up with numerous banks regarding status of production (0.4); call with B. Cohen regarding issues related to processing and review of electronic productions (0.4); review of Memo from A. Corey regarding Boston Generating decision (0.5).	B120	2.5
8/19/2020	VJ	Revise and finalize Fifth Fee Statement and e-file same.	B160	0.5
8/19/2020	STB	Conversations with RC and DM regarding streamlining acquisition of digital files; discussions with Russell re same; drafting email regarding setting up of production account and procedure going forward; calls re same.	B120	2.2
8/19/2020	DJM	Follow up with counsel for Pershing regarding production (0.2); analysis of Pershing production (0.3); call with S. Breidenbach regarding issues related to receipt and processing of productions (0.4); e-mail with counsel to BNY Mellon (0.1); e-mail with counsel to BofA (0.1), e-mails with counsel to Raymond James (0.2).	B120	1.3
8/19/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	1.6
8/20/2020	DJM	Attend weekly team meeting re: substantive discussion.	B110	0.3
8/20/2020	VJ	Team conference call.	B110	0.3
8/20/2020	JPC	Attend team meeting re: substantive issues re: to subpoenas and recent 546(e) decision.	B110	0.3
8/20/2020	DJM	Review and analysis of data from BNY Mellon, e-mails with counsel for same.	B120	0.5
8/20/2020	TAB	Prepare for and participate on weekly team call.	B110	0.3
8/20/2020	ADC	Telephone conversation with Sears team re latest case developments.	B120	0.3
8/20/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	1.3
8/21/2020	DJM	Downloading, review and analysis of Bank of America production (0.5); e-mails with S. Thomas regarding same (0.3)	B120	0.8
8/21/2020	SMT	Telephone call with D. Marlow regarding progress of production analysis and processing of same.	B120	0.3
8/21/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	2.2
8/21/2020	SMT	Process BofA production documents.	B120	0.4
8/24/2020	STB	Follow up on establishment of production email account to receive documents.	B120	0.5
8/25/2020	VJ	Email Fee Applications to accounting department.	B110	0.2
8/25/2020	JPC	Gather information for M-III partners.	B160	0.3
8/25/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	2.0
8/25/2020	DJM	Download, review and analysis of Raymond James production (0.4); e-mails with S. Thomas regarding Raymond James production and handling of same (0.3); follow up with various banks regarding production (0.4); updating of service chart (0.3).	B120	1.4
8/26/2020	DJM	E-mails with counsel for U.S. Bank (0.2); follow up with PNC Bank (0.2); follow up with Pershing (0.1); call with S. Thomas regarding Citibank production (0.2).	B120	0.7

8/26/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	1.8
8/26/2020	SMT	Process USAA Investment Management Co. production documents.	B120	0.4
8/27/2020	ADC	Review and Analysis of Nine West decision for applicability to Sears action.	B120	0.6
8/27/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	2.1
8/28/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	2.3
8/31/2020	SMT	Analysis of document production information contained in shareholder chart.	B120	2.6
8/31/2020	ADC	Review and Analysis of the In re Nine West decision and drafted a summary for the Sears team.	B120	3.6
				<hr/> 116.9



MORITT HOCK & HAMROFF LLP
INVOICE DATED OCTOBER 2020

File # N-1944.001 Re: Sears Bankruptcy

Date	Prof	Narrative	Task Code	Time
9/1/2020	TAD	Review bankruptcy docket re: notice of fee applications (.2); emails with Akin re: status of hearing on interim fee application (.2).	B160	0.40
9/1/2020	DJM	Review of e-mails from Akin Gump (.2); review of data and drafting of e-mail in response regarding status of subpoenas (1.2).	B120	1.40
9/1/2020	SMT	Telephone call with J. Chou and Melodie Young (Akin Gump) regarding status of production review.	B120	0.60
9/1/2020	SMT	Analysis of document production information contained in shareholder chart (3.0); reviewed recent production for status of review and processing (.7)	B120	3.70
9/1/2020	TAB	Conference call to discuss additional staffing (0.2).	B110	0.20
9/1/2020	JPC	Review email from Akin re: subpoenas, statute of limitations and potential motions to compel; analysis of question re: SOL.	B120	0.80
9/1/2020	JPC	T/c w/ S. Thomas-Marino re: production stats (.2); t/c/ w/ M. Young re: production stats and logistics (.4); follow-up call w/ S. Thomas Marino.	B120	0.70
9/1/2020	JPC	Review data for M-III Partners.	B160	0.20
9/1/2020	JPC	Attention to staffing for production processing (.6); t/c w/ T. Berkowitz and R. Cohen re: same (.2).	B110	0.80
9/1/2020	RSC	Communicate with practice group leaders and associates re: securing 4 attorneys on a priority basis to clear other work and staff new project (.6).	B110	0.60
9/1/2020	TAB	Review motion to compel issues regarding failure to respond to subpoenas (.5); Review and analyze notice issues related to statute of limitation (.3).	B120	0.80
9/1/2020	VJ	Review docket for hearing date on Fee Applications and discuss with TAD.	B110	0.30
9/1/2020	RSC	Call with J. Chou and T. Berkowitz re: staffing for public shareholder data analysis (.2); review options and prepare notes (.3).	B110	0.50
9/1/2020	STB	eDiscovery: confirm configuration of email and share file account re: production from third parties.	B120	0.30
9/2/2020	JC	Review and analysis of public shareholder data disclosure from Citibank.	B120	1.70
9/2/2020	NGC	Virtual meeting to discuss production assignment. Review tasks go over final products of data sets	B120	0.50
9/2/2020	SMT	Analysis of public shareholder data.	B120	5.30
9/2/2020	DJM	Team call regarding project to analyze and input public shareholder data (0.8); preparation for call (0.3); follow up e-mails with team (0.4).	B120	1.50
9/2/2020	MSD	Communicate with MHH data analysis team regarding strategy for review and data entry.	B120	0.50
9/2/2020	NGC	Communicate (in firm) with SMT regarding public shareholder data production to determine how to produce final data sheets and translate excel formulas into data entries	B120	0.50

9/2/2020	LB	Analysis of public shareholder data.	B120	3.40
9/2/2020	TAB	Conference re preparation for motion to compel.	B120	0.30
9/2/2020	DJM	E-mails with Akin Gump regarding public shareholder analysis.	B120	0.50
9/2/2020	SMT	Emailed team shareholder data and information (0.3); team meeting regarding analysis of public shareholder data (0.5); email and telephone call with N. Calabria regarding shareholder data (0.3).	B120	1.10
9/2/2020	JC	Discussion with team re: of public shareholder data and discovery analysis.	B120	0.50
9/2/2020	MSD	Communicate with MHH public shareholder analysis team regarding strategy and formulas for review; review multiple correspondences regarding same.	B120	0.40
9/2/2020	TMK	Communicate (in firm) re: analysis of production and data.	B120	0.50
9/2/2020	JPC	T/c w/ S. Marino-Thomas re: status on staffing and timing for completing production data analysis (.2); call w/ D. Marlow and S. Marino re: issues regarding project and logistics (.1); emails w/ D. Marlowe re: same (.5).	B110	0.80
9/2/2020	JPC	Team call re: analysis of production data (.5); call w/ M. Young re: production data and SOL issues (.1); review memo from A. Corey re: recent 546(e) decision (.3).	B120	0.90
9/2/2020	MSD	Begin review and analysis of Raymond James Seritage public shareholder data.	B120	4.60
9/2/2020	NGC	Review and analysis of public shareholder data	B120	5.00
9/2/2020	RSC	Communicate with 3 associates re: joining team for project (.5); T/C and exchange emails with Danny re: final staffing (.2).	B110	0.70
9/2/2020	DJM	Calls with S. Thomas regarding analysis project (0.3); e-mails with J. Chou regarding same (0.2).	B120	0.50
9/2/2020	LB	Attend Webex conference to discuss public shareholder data analysis matter.	B120	0.50
9/3/2020	JC	Review and Analysis of public shareholder information disclosed by USBancorp Investments.	B120	1.40
9/3/2020	JPC	Attention to parties who may require motion to compel (.2); review memo re: In re Global Crossings and statute of limitations issue (.3); analysis of same (.9); analysis of related case law (1.0).	B120	2.80
9/3/2020	NGC	Review and Analysis of public shareholder data	B120	2.00
9/3/2020	TMK	Analysis of public shareholder data.	B120	0.40
9/3/2020	MSD	Continue review and analysis of Raymond James Seritage public shareholder data.	B120	1.80
9/3/2020	DJM	E-mails with Akin Gump regarding subpoenas, potential motion to compel (0.7); review of draft letter to the bankruptcy court and exhibits from Akin Gump and queries regarding same (0.3); responses to questions from review team regarding public shareholder data (0.5)	B120	1.50
9/3/2020	LB	Analysis of public shareholder data.	B120	6.70
9/3/2020	MSD	Communicate with DM and SMT regarding issues and strategy with raw shareholder data in native format.	B120	0.30
9/3/2020	JPC	Attention to staffing (.2); confer w/ R. Cohen and T. Berkowitz re: same (.5).	B110	0.70

9/3/2020	JC	Communicate (in firm) with Sheila Marino-Thomas regarding further analysis of shareholder information.	B120	0.90
9/3/2020	JPC	Draft status email to team.	B110	0.70
9/3/2020	TAB	Follow up on Motion to Compel service issues and identity of parties (.3); Review and comment on letter re subpoena status (.2).	B120	0.50
9/3/2020	NGC	Communicate (in firm) virtual meeting with MDT to explain excel formulas and shortcuts to process shareholder data	B120	0.90
9/3/2020	MSD	Continue review and analysis of Raymond James Seritage public shareholder data.	B120	3.30
9/3/2020	SMT	Analysis of public shareholder data.	B120	5.40
9/4/2020	JPC	Review billing descriptions and time allocations for next monthly billing statement.	B160	0.90
9/4/2020	DJM	Draft/revise motion to compel compliance with subpoenas and exhibits (2.7); multiple e-mails with Akin Gump regarding motion to compel and revisions in light of comments (.6); coordination of filing of motion to compel (.5); sending of letter to Chambers (.2); sending of letter to subpoenaed parties (.4); review of memo regarding recent bankruptcy decision (.4).	B120	4.80
9/4/2020	MSD	Continue review and analysis of Raymond James Seritage public shareholder data.	B120	4.40
9/4/2020	JPC	Review and revise draft letter joining Akin's request for conference and revise same (.8) confer w/ D. Marlow re: list of third parties for letter. (.1); emails re: letter (.2).	B120	1.10
9/4/2020	MSD	Continue review and analysis of Raymond James Seritage public shareholder data.	B120	3.30
9/4/2020	DCA	Utilize court's Electronic Court Filing system to file Joinder Letter and exhibits.	B110	2.00
9/4/2020	SMT	Analysis of public shareholder data.	B120	6.70
9/4/2020	VJ	Check bankruptcy docket for Akin filing (.1); emails with attorneys regarding filing Joinder Letter (.2).	B110	0.30
9/4/2020	ADC	Review and revise 6th monthly fee statement fee application payment.	B160	0.50
9/4/2020	NGC	Communicate with MDT to assist with production by explaining shortcuts in excel document review	B120	0.40
9/5/2020	SMT	Analysis of public shareholder data.	B120	5.30
9/6/2020	MSD	Finalize review and analysis of Raymond James Seritage public shareholder data.	B120	2.60
9/7/2020	MSD	Review and analyze Raymond James Land's End public shareholder data.	B120	5.70
9/8/2020	NGC	Review and analysis of excel production and assist SMT in aggregation of Phase I data from initial sorts (7.5); discuss same w/SMT (1.0).	B120	8.50
9/8/2020	JPC	Check in with team re: status of data entry.	B110	0.20
9/8/2020	SMT	Discussions with N. Calabria regarding analysis of public shareholder data.	B120	1.00
9/8/2020	ADC	Review and analysis of Sidley letter re Subpoenas.	B120	0.30

9/8/2020	DJM	Follow up with multiple banks regarding production, timing (.5); call regarding US Bank subpoena (.2); e-mails with BNY Mellon (.1); follow up with S. Thomas regarding analysis of public shareholder data (.4); e-mails with Akin regarding motion to compel (.3), review of Jefferies submission to Court (.1).	B120	1.60
9/8/2020	SMT	Analysis of public shareholder data.	B120	13.30
9/8/2020	JPC	Review letter from Sidley Austin on behalf of Jefferies re: Committee's request for court conference.	B120	0.10
9/8/2020	MSD	Finalize drafting of analysis of Raymond James data analysis (1.1); discuss analysis, strategy and aggregation with SMT (.2).	B120	1.30
9/8/2020	NGC	Communicate with SMT on assisting with aggregating phase I productions	B120	1.00
9/9/2020	NGC	Communicate with SMT to strategize and delegate the completion of production.	B120	0.20
9/9/2020	MSD	Review and analyze missing entries in Raymond James raw data for strategy and analysis (.5); discuss same and missing entries with DJM (.1).	B120	0.60
9/9/2020	DJM	Call with counsel to Morgan Stanley (.2); e-mails with counsel to PNC Bank (.2); e-mails with S. Thomas regarding analysis of public shareholder data project (.4); follow up e-mail to National Financial Services for missing data (.2); follow up e-mails to Raymond James for missing data (.2).	B120	1.20
9/9/2020	JC	Further Review and analysis of public shareholder disclosure from Citibank and aggregate relevant data.	B120	0.60
9/9/2020	JC	Further Review and analysis of public shareholder disclosure from USBancorp and aggregate relevant data.	B120	0.80
9/9/2020	NGC	Review and analysis of document and data production	B120	8.00
9/9/2020	SMT	Analysis of public shareholder data.	B120	13.80
9/9/2020	SMT	Draft/revise subpoena to PNC Bank.	B120	0.30
9/9/2020	SMT	Discussions with N. Calabria regarding analysis of public shareholder data.	B120	0.20
9/9/2020	JPC	Reviewing August 2020 time entries and descriptions for monthly fee statement.	B160	0.30
9/10/2020	SMT	Analysis of public shareholder data.	B120	5.00
9/10/2020	VJ	Draft Sixth Monthly Fee Statement and forward to JPC and TAD.	B160	3.70
9/10/2020	SMT	Discussions with N. Calabria regarding analysis of public shareholder data.	B120	0.90
9/10/2020	ADC	Weekly team update call (.2).	B110	0.20
9/10/2020	JPC	Communications w/ D. Marlow re: Deutsche Bank response to letter to Court (.2); email w/ team re: Motion to Compel (.2); check on status of subpoena production data (.1); review draft motion to compel (.4).	B120	0.90
9/10/2020	TAB	Work on litigation proposal issues (.5); review chart re subpoenas (.3); review and analyze Akin Motion to Compel (.8); review email from Akin Gump to Judge Drain (.1).	B120	1.70
9/10/2020	ADC	Draft/revise motion to compel to include Clearstream (1.2).	B120	1.20
9/10/2020	NGC	Review and Analysis of data sets and documents for production	B120	2.70
9/10/2020	VJ	Weekly Webex with team.	B110	0.20

9/10/2020	JPC	T/c w/ T. Berkowitz re: next phase of Sears matter (.1); attention to case management issues (.3).	B110	0.40
9/10/2020	NGC	Communicate with SMT to review and strategize for the completion of the data production	B120	0.90
9/10/2020	DJM	Attend weekly team call.	B110	0.20
9/10/2020	DJM	E-mails with counsel for PNC (.1); e-mails with counsel for BNY Mellon (.1); calls/e-mails with Deutsche Bank (.5); e-mails with Akin regarding status of subpoenas (.4); call with S. Thomas regarding analysis of shareholder data (.3); review/revise chart analyzing public shareholder data (1.8 hours), review of draft motion to compel and call with A. Corey regarding same (.5).	B120	3.70
9/10/2020	JPC	Weekly team meeting re: status of various projects.	B110	0.20
9/10/2020	JPC	Review 6th Monthly Fee Statement for filing.	B160	0.70
9/11/2020	JPC	Confer w/ A. Corey re: motion to compel, including specific issues pertaining to Clearstream Banking (.2); emails re: status of forthcoming productions from additional parties (.1); attention to issues for motion to compel (.3).	B120	0.60
9/11/2020	DJM	Draft/revise motion to compel parties failing to respond to subpoenas (2.5); follow up with Deutsche Bank (.1); follow up with JP Morgan (.1); follow up with PNC (.1); e-mails with Akin Gump regarding status of subpoenas (.4); multiple calls/e-mails with S. Thomas regarding analysis of shareholder data project (.6).	B120	3.80
9/11/2020	JPC	Communications with local counsel re: Motion for Contempt -- compelling LGIM (1.1); gather information for local counsel and send detailed email concerning same (2.0).	B110	3.10
9/11/2020	ADC	Draft/revise motion to compel subpoena compliance.	B120	2.20
9/11/2020	TAB	Prepare for and participate on call with Akin to discuss future litigation subsequent to subpoenas (1.0); follow up on scheduling issues with Akin and chambers (0.3).	B110	1.30
9/11/2020	VJ	Respond to emails from JPC regarding Fifth and Sixth Monthly Fee Statements (.2) and forward Fifth Monthly Fee Statement to all noticed parties (.2).	B160	0.40
9/11/2020	VJ	Finalize Sixth Monthly Fee Statement and e-file same (.3); email to all noticed parties (.2).	B160	0.50
9/11/2020	SMT	Emails with D. Marlow regarding analysis of public shareholder data (.3); email attaching affidavits of service for select entities (.1).	B120	0.40
9/11/2020	JPC	Conference call w/ Ted Berkowitz and D. Chapman re: next phase of the case; (.2) T/c w/ T. Berkowitz (.2)	B110	0.70
9/11/2020	SMT	Analysis of public shareholder data.	B120	4.20
9/12/2020	JPC	Conference call w/ Chicago counsel re: motion to compel procedure and issues (.3); conference call w/ D. Marlow and A. Corey re: follow up on motion to compel Illinois entity (.2).	B120	0.50
9/12/2020	JPC	Emails w/ Chicago counsel re: engagement and conflicts issues.	B110	0.30
9/12/2020	ADC	Draft/revise motion to compel (1.5); research case law in support of motion to compel (1.7); conference call with JPC and DJM; researched case law concerning place of enforcement of subpoena (1.0).	B120	4.40
9/12/2020	DJM	Draft/revise motion to compel compliance with subpoenas and legal research in connection with same (2.5); call with local counsel in Chicago regarding motion to compel (.3); follow up call with J. Chou, A. Corey regarding same (0.2).	B120	3.00

9/13/2020	JPC	Review and revise motion to compel (4.4); confer w/ A. Corey re: same (.6); emails w/ A. Corey re: research (.2).	B120	5.20
9/13/2020	ADC	Research & Analysis of case law to support motion to compel (3.2); phone conversations with J. Chou regarding motion to compel (0.6).	B120	3.80
9/13/2020	DJM	Revisions to motion to compel to incorporate comments from J. Chou.	B120	1.00
9/14/2020	SMT	Analysis of public shareholder data.	B120	2.30
9/14/2020	JPC	Attention to billing structure for adversary proceeding against public shareholders.	B160	1.20
9/14/2020	SMT	Email with D. Marlow regarding status of subpoenas.	B120	0.30
9/14/2020	JPC	Attention to conflicts issues for engagement of Chicago counsel.	B110	0.40
9/14/2020	JPC	Review and revise latest draft motion to compel (2.4); confer w/ A. Corey re: same (.6).	B120	3.00
9/14/2020	TAB	Review and revise Motion to Compel.	B120	1.50
9/14/2020	ADC	Draft/revise notice of motion, memo of law, proposed order, declaration in support, affidavit of service (5.8); coordinated with Akin counsel and team in email and calls to discuss filings and comments to the motion papers (2.1).	B120	7.90
9/14/2020	SMT	Process PNC Financial Service and Bank of NY Mellon production documents.	B120	0.60
9/14/2020	SMT	Draft/revise subpoena to Legal & General Investment Management Limited with Chicago production address as per Chicago counsel.	B120	0.60
9/14/2020	DJM	Multiple revisions to motion to compel and ancillary documents, including to add PNC and remove Morgan Stanley (2.8); multiple e-mails with T. Berkowitz, J. Chou, and A. Corey regarding motion to compel (1.2); call with Morgan Stanley and e-mail memorializing agreement (0.4); e-mails with PNC (0.1); multiple e-mails with local counsel regarding LGIM subpoena and revisions to same (0.6); service of motion to compel to court and counterparties (0.4)	B120	5.50
9/14/2020	DCA	Correspondence with attorneys re: filing of Motion to Compel (.5); review and organize documents for filing (1.5), utilize court's Electronic Court Filing system to file Notice of Hearing on the Motion of the Official Committee of Unsecured Creditors for an Order to Compel Bankruptcy Rule 2004 Production of Documents, Declaration and Exhibits, and Affidavit of Service (.5).	B110	2.50
9/15/2020	ADC	Telephone conversation w/J. Chou regarding assisting local counsel with conflicts check.	B110	0.20
9/15/2020	SMT	Mail service of Docket 8438 Notice of Hearing on the Motion of the Official Committee of Unsecured Creditors for an Order to Compel Bankruptcy Rule 2004 Production of Documents to the parties.	B120	0.40
9/15/2020	JPC	Gather and analyze accrual info for M-III Partners.	B160	0.50
9/15/2020	DJM	Call with S. Thomas regarding PNC data (0.1); follow up with PNC regarding production (0.2); review and analysis of US Bank production (0.3).	B120	0.60
9/15/2020	SMT	Analysis of public shareholder data.	B120	5.80
9/15/2020	SMT	Discussion with N. Calabria regarding additional data for analysis.	B120	0.40
9/15/2020	JPC	Emails with Chicago counsel re: conflicts check and engagement logistics.	B110	0.80

9/15/2020	JPC	Prepare fee arrangement proposal (1.0); confer w/ T. Berkowitz re: fee proposal (.1); prepare email to D. Chapman re: fee arrangement proposal (.7).	B110	1.80
9/15/2020	NGC	Communicate with SMT regarding new data production and review/analysis of data required.	B120	0.30
9/15/2020	TAB	Work on litigation proposal - review and revise.	B110	0.90
9/16/2020	ADC	Telephone conversations and correspondence with local Chicago counsel (.5); Akin Gump (.5); and with J. Chou (.3) assist local counsel with conflicts checks and analysis.	B110	1.30
9/16/2020	NGC	Review and analysis of public shareholder information production.	B120	5.40
9/16/2020	JPC	T/c w/ local counsel re: motion to compel subpoena compliance (.2); confer w/ T. Berkowitz re: local counsel (.3); email to D. Marlow and A. Corey re: local counsel issue (.2); various t/c w/ A. Corey re: local counsel issue and conflicts questions (1.3).	B110	1.90
9/16/2020	SMT	Process US Bank N.A. production documents.	B120	0.30
9/16/2020	TAB	Work on retention of local Chicago counsel.	B110	0.80
9/16/2020	SMT	Discussion with N. Calabria regarding data analysis.	B120	0.40
9/16/2020	SMT	Analysis of public shareholder data.	B120	8.00
9/16/2020	DJM	Review and analysis of Wells Fargo production, coordination with S. Thomas regarding inputting of same.	B120	0.50
9/16/2020	NGC	Communicate discussion with SMT regarding additional document review and production in aggregation of final shareholder information to determine which shareholders can be aggregated and which can not be.	B120	0.40
9/17/2020	ADC	Communicate with local counsel to provide conflicts check information and address related questions (1.8); attended weekly Sears team meeting (.4); drafted and revised declaration for location counsel re conflicts (.5).	B110	2.70
9/17/2020	DJM	Weekly team call.	B110	0.40
9/17/2020	SMT	Emailed Executive Attorney Service regarding status of service to Legal & General Investment Management Limited.	B120	0.10
9/17/2020	TAB	Work on revising litigation proposal.	B110	1.00
9/17/2020	STB	Converting word document into excel chart.	B120	0.40
9/17/2020	DJM	Call with S. Thomas regarding analysis of BNY Mellon data and research in connection with same (0.5); e-mail to BNY Mellon regarding same (0.1).	B120	0.60
9/17/2020	JPC	Team meeting to discuss subpoena, Chicago counsel retention and budget for adversary proceeding.	B110	0.40
9/17/2020	TAB	Attend weekly team call.	B110	0.40
9/17/2020	JPC	Email w/ Akin re: subpoenas and next phase of litigation (0.2); review draft budget (0.5); revise budget (2.1); confer w/ T. Berkowitz re: same (0.2); email to D. Chapman re: proposed budget (0.2).	B110	3.20
9/17/2020	SMT	Emailed D. Marlow status of subpoena to Legal & General Investment Management Limited.	B120	0.10
9/17/2020	DJM	Draft/revise budget for potential adversary proceeding.	B110	2.00

9/17/2020	JPC	Attention to Chicago counsel retention.	B110	1.00
9/17/2020	SMT	Analysis of public shareholder data.	B120	4.70
9/18/2020	DJM	Preparation for and call with counsel for Clearstream regarding motion to compel (0.5), follow up e-mail to J. Chou (0.2); download and review and analysis of JP Morgan production (0.4), e-mailing of same to S. Thomas (0.1).	B120	1.20
9/18/2020	TAB	Review and revise litigation budget.	B120	1.20
9/18/2020	SMT	Analysis of public shareholder data (6.9); updates to subpoena service tracking chart (0.3).	B120	7.20
9/21/2020	SMT	Process JP Morgan production documents.	B120	0.40
9/21/2020	SMT	Analysis of public shareholder data.	B120	4.20
9/21/2020	STB	Analysis of public shareholder data.	B120	0.60
9/21/2020	NGC	Discussions regarding analysis of public shareholder data with SMT and SB.	B120	0.90
9/21/2020	DJM	Call/e-mails with counsel to LGIM (0.4); e-mail to J. Chou regarding same (0.1), call with S. Thomas regarding public shareholder chart (0.2), e-mails with Akin regarding public shareholder chart (0.4).	B120	1.10
9/21/2020	NGC	Discussions with SMT regarding analysis of public shareholder data.	B120	0.70
9/21/2020	STB	Discussions regarding analysis of public shareholder data.	B120	0.90
9/21/2020	JPC	Analysis and aggregating data for M-III partners.	B160	0.50
9/21/2020	SMT	Discussions with N. Calabria and S. Breidenbach regarding analysis of public shareholder data concerning JPMorgan.	B120	0.90
9/22/2020	SMT	Telephone with D. Marlow and Melodie Young at Akin Gump regarding shareholder data (0.4); discussions with N. Calabria regarding Akin project (0.5).	B120	0.90
9/22/2020	TAB	Prepare for and participate on conference call with Akin to discuss litigation budget (.3); t/c w/J. Chou re: same (.2).	B110	0.50
9/22/2020	DJM	E-mail to Akin regarding status of public shareholder subpoenas and review of charts and analysis in connection with same (0.8); calls with S. Thomas and Akin regarding analysis of public shareholder data (0.6); review and analysis of Akin public shareholder chart and e-mail (0.6); follow up with various banks regarding production (0.2).	B120	2.20
9/22/2020	JPC	Further analysis of data for M-III Partners.	B160	0.20
9/22/2020	JPC	Conference call w/ D. Chapman and T. Berkowitz (.2); t/c w/ T. Berkowitz (.2).	B110	0.40
9/22/2020	SMT	Analysis of public shareholder data. (1.2); analysis and edits to estimated damages chart (2.6)	B120	3.80
9/22/2020	NGC	Discussions regarding analysis if public shareholder data with SMT	B120	0.50
9/23/2020	JPC	Attention to additional billing data and property estate/adversary allocations for M-III Partners.	B160	0.80
9/23/2020	STB	Analysis of public shareholder data.	B120	4.00
9/23/2020	SMT	Discussions with N. Calabria and S. Breidenbach regarding analysis of public shareholder data concerning JPMorgan.	B120	1.10
9/23/2020	STB	Discussion with NGC and SB regarding analysis of public shareholder data.	B120	1.10

9/23/2020	DJM	Call with S. Thomas regarding shareholder chart (0.2); review of revised chart (0.3).	B120	0.50
9/23/2020	SMT	Telephone with Melodie Young at Akin Gump regarding shareholder data (0.3); emailed same attaching updated data (0.1).	B120	0.40
9/23/2020	NGC	Communicate with SMT and SB regarding analysis of public shareholder data.	B120	1.10
9/23/2020	SMT	Analysis and edits to estimated damages chart.	B120	7.40
9/24/2020	STB	Analysis of public shareholder data.	B120	1.20
9/24/2020	DJM	Attend weekly team call (0.2); prepare for same (0.1).	B110	0.30
9/24/2020	TAB	Attend weekly meeting re: status of tasks.	B110	0.20
9/24/2020	JPC	Attention to emails re: motion to compel, including email re: Clearstream's response to motion papers (.3); review draft letter to the court regarding releasing parties from motion to compel (.3); email D. Marlow re: same (.1).	B120	0.70
9/24/2020	SMT	Discussions with N. Calabria and S. Breidenbach regarding analysis of public shareholder data concerning JPMorgan.	B120	0.70
9/24/2020	JPC	Team meeting re: motion to compel and responses.	B110	0.30
9/24/2020	DJM	Analysis of information provided by Clearstream, call with same (0.5); e-mails with J. Chou, Akin regarding same, motion to compel (0.3); drafting, finalizing and coordination of filing letter to court withdrawing motion to compel with regard to Clearstream and LGIM and e-mailing same to Court (1.5); office conference with S. Thomas regarding analysis of public shareholder data (0.2); review of supplemental production by U.S. Bank (0.1).	B120	2.60
9/24/2020	NGC	Communicate with SMT and SB regarding public shareholder data	B120	0.70
9/24/2020	ADC	Communicate with Sears team regarding Clearbank's response to the subpoena (.3); reviewed letter withdrawing motion w/r/t Clearbank and LGIM (.2); communicated with local counsel (.2)	B120	0.70
9/24/2020	STB	Discussions w/SMT and NGC regarding analysis of public shareholder data.	B120	0.70
9/24/2020	DCA	Utilize court's Electronic Court Filing system to file Letter to J. Drain re Withdrawing Compel Motion with Regard to Clearstream and LGIM.	B110	0.40
9/25/2020	DJM	Response to various queries from Akin Gump, including review of productions and research in connection with same (1.0); call with S. Thomas regarding status of public shareholder chart (0.1).	B120	1.10
9/25/2020	SMT	Analysis of public shareholder data.	B120	2.20
9/25/2020	SMT	Discussions with N. Calabria and S. Breidenbach regarding analysis of public shareholder data concerning JPMorgan.	B120	2.50
9/25/2020	NGC	Discussions and analytical review with SB and SMT regarding public shareholder information for aggregation and analysis	B120	2.50
9/25/2020	STB	Discussions with SMT and NGC regarding analysis of public shareholder data.	B120	2.50
9/25/2020	STB	Analysis of public shareholder data.	B120	2.70
9/27/2020	DJM	Review and analysis of Jefferies objection, Akin comments on same (0.4); call with S. Thomas regarding transfer of data to ASK (0.2).	B120	0.60

9/28/2020	JPC	Review and analyze Jefferies' opposition brief to motion to compel (.5); review documents referenced therein (.5).	B120	1.00
9/28/2020	SMT	Discussions with D. Marlow regarding shareholder files (0.3); discussion with IT department regarding same (0.3).	B120	0.60
9/28/2020	DJM	Review of Jefferies objection and Akin comments on same (0.4); call with S. Thomas regarding transfer of data to ASK (0.2).	B120	0.60
9/28/2020	ADC	Review and analysis of Jefferies opposition papers and outlined reply.	B120	1.20
9/28/2020	NGC	Communicate with SMT regarding public shareholder analysis and workbook results	B120	0.20
9/28/2020	SMT	Prepared production files, subpoenas and emails to entities relating to threshold shares.	B120	1.90
9/28/2020	SMT	Analysis of public shareholder data (1.0); communicate with NGC re: same (.2).	B120	1.20
9/29/2020	SMT	Prepared production files, subpoenas and emails to entities relating to threshold shares.	B120	2.20
9/29/2020	JPC	Confer w/ A. Corey re: reply brief to Jefferies opposition to MTC (.3); confer w/ D. Marlow re: PNC opposition to MTC (.2); review and analyze PNC Opposition to MTC and related email correspondence with PNC (1.7).	B120	2.20
9/29/2020	ADC	Draft/revise reply papers to Jefferies' opp (5.0); researched case law in support of reply brief (1.4)	B120	6.40
9/29/2020	DJM	Review of PNC opposition to motion to compel, drafting of reply (2.2); provision of materials to A. Corey in connection with reply on motion to compel addressed to Jefferies (0.4); response to queries from Akin regarding public shareholder data (0.3); e-mails/calls with S. Thomas regarding provisions of information to ASK (0.4); follow up with outstanding banks regarding production (0.1)	B120	3.40
9/29/2020	JPC	Compiling data for M-III Partners.	B160	0.60
9/30/2020	DJM	Draft/revise reply in further support of motion to compel PNC (2.0); revisions to reply in further support of motion to compel Jefferies (1.0); call with S. Thomas regarding transfer of file to ASK (0.2).	B120	3.20
9/30/2020	JPC	Review and analyze PNC opposition to MTC (.3); revising reply papers to PNC (1.7); revising reply brief to Jefferies' opposition to MTC (2.2); analyze Jefferies' opposition (.5); confer w/ A. Corey re: same (.3).	B120	5.00
9/30/2020	SMT	Prepared production files, subpoenas and emails to entities relating to threshold shares (1.7); upload results to Akin share site (0.4).	B120	2.10
9/30/2020	ADC	Draft/revise Jefferies reply brief and reply declaration (3.9); confer w/J. Chou re: comments to brief (.3); researched case law in support of reply brief (1.1); reviewed draft PNC papers (.5).	B120	5.80

398.00



MORITT HOCK & HAMROFF LLP
INVOICE DATED NOVEMBER 2020
File # N-1944.001 Re: Sears Bankruptcy

Date	Prof	Narrative	Task Code	Units
10/1/2020	DJM	Review of J. Chou and T. Berkowitz revisions to replies on motions to compel, revisions to drafts to incorporate same (1.1); e-mails regarding replies (0.2), sending of drafts to Akin (0.2), revisions to address Akin comments (0.5).	B120	2.00
10/1/2020	JPC	Further revisions to reply to PNC re: Motion to Compel (2.0); further revising reply brief to Jefferies opposition (2.1).	B120	4.10
10/1/2020	TAB	Review and revise Committee response to Opposition to PNC and Jefferies.	B120	1.20
10/1/2020	ADC	Draft/revise motion to compel reply brief incorporating edits from MHH team and Akin.	B120	4.10
10/2/2020	JPC	Review and make final comments/edits to Reply to Jefferies opposition to Motion to Compel for filing (0.6); review comments to draft reply briefs (0.2); review and make final comments to reply to PNC brief for filing (0.8).	B120	1.60
10/2/2020	ADC	Draft/revise reply briefs and assist in their filing.	B120	1.20
10/2/2020	CH	Pacer- Efiled Reply Briefs to Compel and in opposition to Doc. Nos. 8461 & 8462 (0.3); Discuss said with ADC (0.2); Download and efiled Filing Confirmation Receipts (0.3).	B110	0.80
10/2/2020	JPC	Prepare email to M-III Partners re: fees information and timing.	B160	0.20
10/5/2020	DJM	Plan and prepare for oral argument on motions to compel (1.4); call with J. Chou regarding same (0.1).	B120	1.50
10/5/2020	SMT	Review and edits to estimated damages chart.	B120	0.60
10/5/2020	VJ	Emails with JPC, TAB and DJM (0.2); register attorneys for court hearing (0.4).	B110	0.60
10/5/2020	SMT	Emailed Melodie Young at Akin Gump attaching updated estimated damages chart.	B120	0.10
10/5/2020	TAB	Confer with J Chou re court hearing on Motion to Compel.	B120	0.30
10/5/2020	JPC	Review and analyze motion papers in prep for hearing.	B120	2.40
10/6/2020	JPC	Prepare for hearing (0.8); attend hearing (1.6); debrief w/ D. Marlow re: service issues raised by the Court during hearing and drafting orders (0.2); review and revise draft orders and cover emails to the Court (1.2); related research re: HSBC and PNC corporate structure/entities in connection with same (0.5); email to D. Marlow re: same (0.2).	B120	4.50

10/6/2020	DJM Preparation for hearing on motion to compel compliance with subpoenas (0.9); participation in hearing on motion to compel (1.8); call with J. Chou regarding hearing (0.2); drafting of orders granting motion to compel with respect to BMO Nesbitt, HSBC, Jefferies, and PNC (1.0); legal and factual research in connection with same (0.5); e-mails with counsel to PNC (0.3), call with counsel for Morgan Stanley (0.1); review of Morgan Stanley supplemental production and e-mail to S. Thomas regarding same (0.3).	B120	5.10
10/6/2020	ADC Communicate (in firm) with D. Marlow to provide her with documents to assist with motion to compel oral argument.	B120	0.30
10/7/2020	DJM E-mailing of proposed orders to Jefferies, PNC, HSBC, and BMO Nesbitt to Judge Drain (0.6); e-mailing of entered orders to counsel for Jefferies, PNC and BMO Nesbitt (0.5); review of Judge Drain response regarding HSBC and review of research from A. Corey in connection with same (0.5); call with counsel to BMO Nesbitt and follow up e-mails and provision of supplemental subpoena to same (0.5); coordination with S. Thomas regarding Morgan Stanley production (0.2).	B120	2.30
10/7/2020	SMT Analysis of public shareholder data.	B120	0.80
10/7/2020	ADC Researched service case law on affiliate corporations (2.5); drafted memo summarizing case law (1.0).	B120	3.50
10/7/2020	JPC Review and consider email from Judge Drain re: service of motion to compel HSBC (0.1); confer w/ D. Marlow re: same (0.1); confer w/ A. Corey re: additional research (0.1); review issued orders (0.2); further confer w/ A. Corey re: research findings (0.3); review and analyze HSBC Corporate structure from A. Corey (0.2); review email memo re: research findings from A. Corey (0.2); review email memo re: follow-up research findings (0.1); review and analyze case law re: service of foreign bank through U.S. corporate affiliate (1.0).	B120	2.30
10/7/2020	SMT Prepared production files, subpoena and affidavit of service of an entity relating to threshold shares (0.2); upload results to Akin share site (0.1).	B120	0.30
10/8/2020	DJM Draft/revise and sending of supplemental e-mail to Judge Drain regarding HSBC subpoena (1.2); review of cases in connection with same (0.8.); review of PNC production (0.2); e-mailing with S. Thomas regarding same (0.1).	B120	2.30
10/8/2020	JPC Further review case law re: service on affiliates (0.3); review email to the Court re: appropriate service on HSBC (UK) (0.1).	B120	0.40
10/8/2020	DJM Attend weekly team meeting.	B110	0.20
10/8/2020	JPC Team meeting re: status.	B110	0.20
10/8/2020	VJ Attend Webex team meeting.	B110	0.30
10/8/2020	VJ Register JPC and TAB for Fee Application Hearing on Court Solutions.	B110	0.20
10/9/2020	SMT Discussion with N. Calabria regarding review and analysis of Morgan Stanley production.	B120	0.40
10/9/2020	NGC Review and analysis of public shareholder data for aggregation.	B120	0.20
10/9/2020	DJM Review of supplemental production by Jefferies (0.1); e-mails with S. Thomas regarding same (0.1), review and response to queries from ASK (0.4).	B120	0.60

10/9/2020	SMT Process PNC and Jefferies production documents.	B120	0.40
10/9/2020	JPC Review and make necessary revisions to September billing descriptions, time allocations and task code designations for monthly fee statement.	B160	3.20
10/9/2020	SMT Reviewed production document concerning preliminary address information on the shareholders for complete corporate searches to be conducted (0.6); analysis of public shareholder data (2.6).	B120	3.20
10/9/2020	NGC Review and analysis of Morgan Stanley shareholder data.	B120	0.10
10/9/2020	STB Converting sheets into usable format (0.9); calls re same (0.1).	B120	1.00
10/11/2020	JPC Further review of itemized time for monthly fee statement and reconcile with monthly accrual data.	B160	1.10
10/12/2020	SMT Review and edits to estimated damages chart.	B120	1.80
10/12/2020	DJM Respond to multiple queries from ASK (0.3), coordination with S. Thomas in connection with same (0.3); review of BMO Nesbitt production (0.2); coordination with S. Thomas regarding analysis of same (0.1); review of updated shareholder chart from S. Thomas (0.2); and response to queries from same (0.1).	B120	1.20
10/12/2020	NGC Review and analysis of public shareholder data from Morgan Stanley .	B120	0.80
10/12/2020	SMT Analysis of public shareholder data.	B120	4.30
10/12/2020	SMT Emailed D. Marlow attaching documents concerning questions and status of production analysis.	B120	0.20
10/12/2020	NGC Communicate with SMT regarding public shareholder data of Morgan Stanley to explain breakdown and analysis of data.	B120	0.40
10/12/2020	SMT Telephone call and email with ASK attorney Kara Casteel concerning shareholder data (0.4); draft email to same attaching documents relating to same (0.4); response email to Melodie Young at Akin Gump attaching updated estimated damages chart (0.1).	B120	0.90
10/12/2020	JPC Review and edit latest draft of itemized time report for monthly fee statement (2.0); review proposed order (0.2).	B160	2.20
10/13/2020	JPC Emails w/ D. Marlow re: motion to compel HSBC (0.4); and send email to D. Chapman re: update on communications with the Court re: motion to compel BMO Nesbit and HSBC (0.2).	B120	0.60
10/13/2020	VJ Review Proposed Order and Fee Application and confirm numbers and email attorneys.	B110	0.40
10/13/2020	SMT Emails with Kara Casteel regarding shareholder data.	B120	0.10
10/13/2020	SMT Reviewed Barclays Capital production regarding fund name extension.	B120	0.20
10/13/2020	VJ Review time records and start drafting Seventh Fee Statement.	B160	1.20
10/13/2020	DJM Multiple e-mails with Akin Gump and ASK regarding adversary proceeding and required information (0.6); e-mails with Morgan Stanley, PNC and Barclays requesting supplemental information (0.4); e-mails regarding motion to compel, status (0.2).	B120	1.20

10/14/2020	VJ Continue reviewing time records and drafting Seventh Fee Statement.	B160	1.60
10/14/2020	JPC Email correspondence w/ T. Berkowitz re: hearing on interim fee app. hearing (0.2); reviewing comp order in prep for hearing (0.3); confer w/ A. Corey re: talking points (0.2); review draft talking points (0.2); prep for hearing (0.7).	B160	1.60
10/14/2020	ADC Draft/revise talking points for fee application.	B160	0.60
10/14/2020	DJM Multiple e-mails regarding adversary complaint, questions (0.8); follow up queries to subpoenaed parties (0.4).	B120	1.20
10/14/2020	TAB Review fee order (0.5); Review Application (0.7); Confer with J Chou re conduct of hearing (0.2); Review talking points (0.4).	B120	1.80
10/14/2020	SMT Reviewed U.S. Bank, N.A. production regarding confirmation of select shares.	B120	0.40
10/14/2020	JPC Analysis of data for M-III Partners.	B160	1.00
10/14/2020	SMT Emailed team results of reconfirmation of shares concerning U.S. Bank, N.A..	B120	0.10
10/15/2020	VJ Review, revise and finalize Seventh Fee Statement and forward to JPC and TAD for review.	B160	1.60
10/15/2020	JPC T/c w/ T. Berkowitz re: interim fee hearing (0.2); attend omnibus hearing (0.4); further confer w/ T. Berkowitz re: fee hearing (0.1); review 7th monthly fee statement for filing (0.4).	B160	1.10
10/15/2020	SMT Response emails to Melodie Young and Kara Casteel regarding BNYM production.	B120	0.30
10/15/2020	DJM Attend weekly team meeting re: status.	B110	0.20
10/15/2020	TAB Prepare for and participate on Court Hearing.	B120	1.30
10/15/2020	TAB Prepare for and participate on weekly team call.	B110	0.20
10/15/2020	ADC Conference call with Sears team to discuss case developments.	B110	0.20
10/15/2020	ADC Review and revise monthly fee application.	B160	0.50
10/15/2020	DJM Review of draft adversary complaint.	B120	0.80
10/15/2020	VJ Weekly team meeting re: status of projects.	B110	0.30
10/15/2020	JPC Weekly team meeting re: wind-down of conflicts counsel role, residual work and fee statement.	B110	0.20
10/16/2020	VJ E-file Seventh Fee Statement and email to all noticed parties.	B160	0.60
10/16/2020	SMT Process BMO production documents.	B120	0.40
10/21/2020	DJM Follow up e-mails with subpoena respondents.	B120	0.20
10/21/2020	JPC Analysis of data for M-III Partners.	B160	0.30
10/29/2020	JPC Attention to billing data.	B160	0.10
			<u>85.70</u>



MORITT HOCK & HAMROFF LLP
INVOICE DATED JANUARY 2021
File # N-1944.001 Re: Sears Bankruptcy

Date	Prof	Narrative	Task Code	Units
11/6/2020	JPC	Review October time entries and descriptions for preparation of monthly fee statement.	B160	0.30
11/10/2020	VJ	Draft Eighth Fee Statement for October 2020.	B160	1.80
11/12/2020	JPC	Review and revise draft fee statement.	B160	1.00
11/16/2020	VJ	Review and edit November Invoice (0.8); e-file Eighth Monthly Fee Statement on docket and email to all noticed parties (0.4).	B160	1.20
12/2/2020	VJ	Begin drafting Second Fee Application.	B160	1.50
12/3/2020	SMT	Review and Analysis of share entries concerning Blackrock.	B120	0.60
12/3/2020	SMT	Response email to Kara Casteel regarding findings after review and analysis.	B120	0.20
12/3/2020	VJ	Continue reviewing fee statements, calculating fees and expenses and payments in order to continue drafting second fee application.	B160	5.20
12/4/2020	VJ	Continue drafting Second Fee Application and forward to JPC, TAB, TAD.	B160	6.20
12/10/2020	JPC	Review and revise Second Interim Fee App, including analysis of calculations.	B160	5.80
12/11/2020	JPC	Analysis of fees and payment for interim fee app.	B160	1.00
12/11/2020	TAD	Review draft of second interim fee application.	B160	1.00
12/11/2020	TAD	Revise second interim fee application (.70); further revisions to second interim fee application based on Akin comments (.30).	B160	1.00
12/11/2020	TAD	Review and confirm all fee statement numbers as against billing records, first interim fee application.	B160	1.30
12/11/2020	TAD	Emails and call with Zach Lanier (Akin Gump) re: draft second interim fee application (.40); email J. Chou re: same (.10).	B160	0.50
12/14/2020	JPC	Revising and updating second interim fee application to reflect recent payments.	B160	1.40
12/14/2020	TAD	Review fee application and confirm all numbers.	B160	1.00
12/15/2020	VJ	Efile Second Interim Fee Application and forward filed copy to Prime Clerk for service.	B160	0.50
12/15/2020	JPC	Finalizing interim fee application.	B160	1.40
12/15/2020	TAD	Final review of fee application prior to filing (1.3); correspond with James Chou, Zach Lanier and V. Jankowski re: filing and service of same (0.4).	B160	1.70
12/16/2020	DJM	Draft/revise chart for Akin Gump	B120	3.00
12/17/2020	DJM	Draft/revise chart for Akin Gump, sending of same.	B120	1.80

12/17/2020 SMT	Email with D. Marlow regarding email request from Akin Gump.	B120	0.20
12/17/2020 SMT	Email response to Akin regarding share data information.	B120	0.10
12/21/2020 TAB	Conference call with counsel to the free examiner to discuss protocols for responding to the fee examiners queries.	B160	0.30
12/23/2020 VJ	Prepare spreadsheets as requested by Ballard Spahr.	B160	1.50
12/29/2020 DJM	Review and response to questions from Akin Gump.	B120	0.40
12/31/2020 VJ	Continue preparing Excel speadsheets of information for First Fee Application and Second Fee Application.	B160	2.80
			<hr/> 44.70



MORITT HOCK & HAMROFF LLP
INVOICE DATED February 2021
File # N-1944.001 Re: Sears Bankruptcy

Date	Prof	Narrative	Task Code	Units
1/4/2021	VJ	Review and revise requested spreadsheets for Ballard Spahr and forward documents to JPC and TAB for review.	B160	3.20
1/5/2021	VJ	Convert excel spreadsheets to pdf files in preparation of uploading zip file to Ballard Spahr.	B160	0.30
1/6/2021	VJ	Zip Fee Application files and upload to Ballard Spahr.	B160	0.40
1/7/2021	DJM	Response to additional inquiries from Akin Gump.	B120	0.80
1/11/2021	DJM	Response to queries from ASK.	B120	0.50
1/18/2021	DJM	Analysis in response to query from ASK, e-mails regarding same.	B120	1.00
1/21/2021	VJ	Review time records and draft Ninth Fee Statement.	B160	3.50
1/22/2021	JPC	Review and comment on monthly fee statement.	B160	0.50
1/26/2021	VJ	Emails with TAD regarding Fee Statement (.2); finalize fee statement and efile the Ninth Fee Statement and forward to all noticed parties (.5).	B160	0.70
1/29/2021	DJM	Response to questions from counsel to BNY Mellon.	B120	0.40
1/27/2021	DJM	Review and response to e-mail from ASK.	B120	0.50
				11.80



MORITT HOCK & HAMROFF LLP

INVOICE DATED MARCH 2021

File # N-1944.001 Re: Sears Bankruptcy

Date	Prof	Narrative	Task Code	Units
2/8/2021	JPC	Attention to emails re: fee app for ordinary course professionals; email to T. Driscoll and T. Berkowitz re: same.	B160	0.20
2/9/2021	VJ	Emails with Accounting for payment history and outstanding balances; forward copies of First and Second Fee Applications and Order granting First Fee Application and Statement of Account to TAD.	B160	0.50
2/9/2021	TAD	Review fee examiner correspondence and proposed fee order (.50); review inquiry re: additional payments received after fee application filed (.20); analysis re: same, including breakdown of estate and litigation trust portion (1.2); review monthly fee statements covering fee app and fee re: fee numbers and confirm fee order amounts (.50).	B160	2.40
2/9/2021	TAD	Correspond with Weil Gotshal re: fee order.	B160	0.10
2/11/2021	DJM	Review and analysis in connection with ASK questions regarding BNY production.	B120	0.50
2/11/2021	VJ	Review time records and prepare Tenth Fee Statement (1.3); forward to JPC for review (.10).	B160	1.40
2/12/2021	VJ	Discuss submission of Fee Application information to Fee Examiner with TAD.	B160	0.30
2/12/2021	TAD	Review emails re: fee examiner questions and responses circulated (.60); review and discuss same with V. Jankowski (.30); emails with Ted Berkowitz re: same (.10).	B160	1.00
2/12/2021	JPC	Review monthly fee statement and comment on same.	B160	0.20
2/16/2021	VJ	Finalize and efile Tenth Monthly Fee Statement (.50); email copy to all Noticed parties (.10); calendar Objection date (.10)	B160	0.70
2/18/2021	DJM	Response to queries from ASK and Akin Gump	B120	0.50
2/22/2021	DJM	Respond to queries from ASK LLP (.30), review of Goldman Sachs production in connection with same (.60)	B120	0.90
2/23/2021	DJM	Call with T. Driscoll in preparation for court hearing.	B120	0.60
2/23/2021	VJ	Register TAD for hearing through Court Solutions.	B110	0.20
2/23/2021	TAD	Multiple emails with J. Chou, V. Jankowski re: hearing on Second Interim Fee Application (.30); call with D. Marlow re: litigation services during Second Interim Fee Period (.60).	B160	0.90
2/23/2021	TAD	Review hearing agenda re: fee hearing and review fee examiner report (.70); review Second Interim Fee Application and proposed fee order in preparation for fee hearing (.70).	B160	1.40
2/23/2021	TAD	Attend hearing on Second Interim Fee Application.	B160	0.70
2/24/2021	VJ	Review court's docket for entered Order on compensation and download and forward to JPC, TAD and TAB.	B110	0.30
				12.80



Date	Prof	Narrative	Task Code	Units
3/4/2021	DJM	Follow up with counsel to Morgan Stanley, Goldman Sachs, and BNY Mellon.	B120	0.50
3/10/2021	DJM	Review and analysis of response from Morgan Stanley to query (.30), follow up with Goldman Sachs (.20), e-mails with ASK LLP regarding same (.20).	B120	0.70
3/22/2021	VJ	Review time records (.50) and draft Eleventh Fee Statement (.60); forward to J. Chou (.10).	B160	1.20
3/23/2021	JPC	Review monthly fee statement.	B160	0.20
3/24/2021	VJ	Telephone conversation with TAD to discuss Eleventh Fee Statement and revision.	B160	0.20
3/24/2021	VJ	Correspond with billing department re: edits to time records for fee statement and UST requirements.	B160	0.60
3/24/2021	VJ	Finalize and efile Eleventh Monthly Fee Statement (.40) and email to all noticed parties and JPC and TAD (.10).	B160	0.50
3/24/2021	TAD	Review and revise February Fee Statement.	B160	1.20
3/24/2021	TAD	Correspond with V. Jankowski and billing re: edits to time records for February Fee Statement.	B160	0.50
3/26/2021	DJM	Follow up with Goldman Sachs and BNY Mellon	B120	0.30
4/2/2021	VJ	Draft Third Fee Application for the period 11/1/20-2/28/21.	B160	2.30
4/5/2021	VJ	Continue drafting Third Fee Application.	B160	4.70
4/6/2021	VJ	Review and revise Third Fee Application.	B160	1.60
4/7/2021	TAD	Draft/revise third interim fee application.	B160	1.30
4/7/2021	TAD	Review billing summaries, analysis of payments for fee application (.70); review prior fee application and order re: same (.70).	B160	1.40
4/8/2021	VJ	Review and revise Third Fee Application (.9); emails with Billing Department regarding payments and billable rates (.3).	B160	1.20
4/9/2021	DJM	Review and analysis of response from counsel for Goldman Sachs (.20), sending of same to ASK LLP (.10).	B120	0.30
4/12/2021	JPC	Review third interim fee app (.60); email to MIII Partners re: status (.10).	B160	0.70
4/13/2021	DJM	Draft/revise litigation summary for third interim fee application (.40) and correspond with TAD re same (.20).	B160	0.50
4/13/2021	VJ	Revise Third Fee Application (.20) and discuss same with TAD (.10).	B160	0.30
4/13/2021	TAD	Review billing summaries (.70) and revise third interim fee application (.60).	B160	1.30
4/13/2021	TAD	Correspond with Joseph Szydio, Akin Gump re: Third Interim Fee Application.	B160	0.20

4/14/2021 VJ	Finalize and efile Third Fee Application for Professional Fees.	B160	1.30
4/14/2021 TAD	Review, revise and finalize Third Interim Fee Application (1.2); correspond with Joe Szydlo, Akin Gump re: Committee approval (.10); coordinate filing and service and emails Sears team at Prime Clerk re: same (.50)	B160	1.80
4/26/2021 VJ	Review court's docket for hearing date on Interim Fee Applications and email JPC (.40); calendar court hearing date (.10).	B160	0.40
5/10/2021 DJM	Follow up with BNY Mellon in response to queries from ASK firm.	B120	0.50
5/24/2021 DJM	Follow up with Morgan Stanley regarding query from ASK LLP regarding information produced in response to subpoena.	B120	0.30
5/24/2021 VJ	Register TAD for court appearance on Fee Application.	B160	0.20
5/24/2021 TAD	Review fee hearing agenda and correspond with C. Stauble (Weil) and Joe Szydlo (Akin) re: same (0.4); coordinate hearing court attendance and review same with V. Jankowski (0.2).	B160	0.60
5/25/2021 VJ	Review Judge Drain's calendar and docket to confirm hearing (.1); emails with Billing regarding recent payments received and applied; review account statement (.2), review agenda and Fee Application with TAD (.2).	B160	0.50
5/25/2021 TAD	Prepare for fee hearing (0.7); attend fee hearing (0.7).	B160	1.40
5/25/2021 TAD	Review proposed fee order and A/P records (.30) and correspond with J. Chou re: same (.10).	B160	0.40
6/14/2021 VJ	Review docket for objections to fee statement and email JPC.	B160	0.20
6/17/2021 TAD	Review fee examiner letter and correspond with James Chou re: same.	B160	0.50
6/18/2021 TAD	Review Examiner preliminary report (0.2); review and discuss fee examiner objections with James Chou and Ted Berkowitz (.4).	B160	0.60
6/24/2021 TAD	Review fee examiner issues with Zach Lanier.	B160	0.50
6/30/2021 DJM	Response to query from Akin Gump regarding Sculptor/ Och-Ziff production.	B120	0.50
7/16/2021 JPC	Conference w/ T. Driscoll and T. Berkowitz re: fee examiner analysis.	B160	0.50
7/27/2021 TAD	Correspond with James Chou re: combined monthly fee statement.	B160	0.10
7/28/2021 VJ	Review monthly invoices and email billing and JPC and TAD regarding updated invoices.	B160	0.70
7/29/2021 TAD	Review and analysis of Fee Examiner letter (0.5); review filed MHH fee application (0.3); review pre-bill, unbilled time through June 30 (0.3); call with Paul Harner re: preliminary objections to MHH 1st and 2nd fee applications (0.3).	B160	1.40
8/10/2021 TAD	Correspond with Joseph Szydlo re: final fee application filing status and timing.	B160	0.10
9/1/2021 VJ	Prepare Excel spreadsheet for Third Fee Application per fee examiner request (1.20); emails with Billing Department; forward to TAD for review before submitting to fee examiner (.30).	B160	1.50
9/1/2021 VJ	Review documents and draft Twelfth Fee Statement for March through July and forward to TAD.	B160	1.40
9/7/2021 VJ	Met with T. Driscoll to review and discuss Fee Examiner's objections.	B160	0.40
9/7/2021 VJ	Email Chantelle D'nae McClamb at Ballard Spahr regarding uploading Fee Application.	B160	0.20

9/7/2021 VJ	Upload Zip files to Ballard Spahr website.	B160	0.30
9/8/2021 VJ	Work on response and time entry 'cure' schedules to fee examiner report.	B160	1.50
9/9/2021 VJ	Continue work on responsive Schedules to examiner's preliminary report.	B160	2.00
9/9/2021 TAD	Review fee examiner report with V. Jankowski (0.4) and email to T. Berkowitz, D. Marlow, A. Corey and J. Chou regarding same (0.2)	B160	0.60
9/12/2021 DJM	Revise time entries to address Fee Examiner's preliminary objection.	B160	1.20
9/14/2021 VJ	Review and revise responsive schedules to Fee Examiner's report.	B160	0.40
9/20/2021 VJ	Email D. Marlow regarding time entries for Twelfth Fee Statement (.10); email M. Genetempo in MHH Billing Dept. regarding expenses for Twelfth Fee Statement (.10).	B160	0.20
9/20/2021 VJ	Revision to Twelfth Fee Statement and forward to T. Driscoll and J. Chou.	B160	0.50
		Total:	44.40

EXHIBIT F

SUMMARY OF EXPENSES BY CATEGORY

Description	Amount billed
Postage	\$ 40.58
Photocopies – Inside	\$ 255.80
Research and Records Fees	\$ 60.00
Document Production Fees	\$ 276.00
Process Servers	\$10,820.00
Meals	\$ 31.65
Telephonic Court Appearances	\$ 490.00
Local Transportation	\$ 57.19
Total	\$12,031.22

EXHIBIT G

ITEMIZED EXPENSES

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ba14Ch11-fraudulent conveyancell

Trans No	Matter ID	Client Sort	Matter	Date	Prof	Narrative	Units	Price	Value
1860569	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	02/25/2020		Copies	210.00	0.20	42.00
1861573	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	02/27/2020		Copies	133.00	0.20	26.60
1877725	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	03/05/2020		Executive Attorney Service Inc., Inv # 54142, Rush Process Service of Subpoena to Produce Documents etc upon: Alliance Bernstein LP at New York, NY on 2/27/2020, AXA Equitable Funds Management Group LLC at New York, NY on 2/27/2020, Cyrus Capital Partners LP at New York, NY on 2/27/2020, Bank of New York Mellon at New York, NY on 2/28/2020, Black Rock Inc. at New York, NY on 2/27/2020, Blackstone Group Inc. at New York, NY on 2/27/2020, Barclays Bank PLC at New York, NY on 2/27/2020, Goldman Sachs Group at New York, NY on 2/28/2020, DE Shaw & Co LP at New York, NY on 2/27/2020, Citigroup Inc. at New York, NY on 2/27/2020, Highland Capital Management LP at Dallas, TX on 2/28/2020, Invesco Capital Management LLC at Allianta, GA on 2/27/2020, Absolute Return Capital LLC at Boston, MA on 2/27/2020, Teachers Insurance and Annuity Association of America at Wilmington, DE on 3/2/2020, Sumitomo Mitsui Trust Asset Management at New York, NY on 3/2/2020, Societe Generale Securities Investments at New York, NY on 2/28/2020, Och Ziff Capital Management Group at New York, NY on 2/28/2020,	1.00	4,525.00	4,525.00

08/08/2022

Page 1 of 9

Matter ID begins with 'N-1944.001' and Billed and costs and not hidden

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Final - MHH Listing Wide

Nomura Holding America Inc at New York, NY on 2/28/2020,
Morgan Stanley Investment Banking at New York, NY on 2/28/2020,
Mizuho Asset Management at New York, NY on 2/28/2020,
Merrill Lynch & Co at New York, NY on 2/28/2020,
Mitsubishi UFJ Trust & Banking at New York, NY on 2/28/2020,
The Bank of Nova Scotia at New York, NY on 3/2/2020,
Sandell Investment Services LLC at New York, NY on 2/28/2020,
Sandell Asset Management Corp at New York, NY on 2/28/2020,
Norges Bank Investment Management at New York, NY on 2/28/2020,
Credit Suisse Investment Banking at New York, NY on 3/2/2020,
Credit Suisse Asset Management at New York, NY on 3/2/2020,
Commerzbank AG Asset Management at New York, NY on 2/28/2020,
Comerica Bank at Dallas, TX on 2/28/2020,
Vanguard Group at Malvern, PA on 2/28/2020,
Charles Schwab Investment Management at San Francisco, CA on 2/28/2020

1877823	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	03/12/2020	Executive Attorney Service Inc., Inv # 54474, Service of Subpoena to Produce Documents etc upon Sumitomo Mitsui Trust Bank at Hoboken, NJ and at New York, NY on 3/6/2020	1.00	225.00	225.00
1877832	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	03/12/2020	Executive Attorney Service Inc., Inv # 54476, Service of Subpoena to Produce Documents etc upon Wells Fargo & Co Private Banking at Sacramento, CA on 2/28/2020	1.00	300.00	300.00
1878245	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	03/20/2020	Executive Attorney Service Inc., Inv # 54920, Service of Subpoena to Produce Documents upon: Wolverine Asset Management via Secretary of State (after attempt in IL) on 3/19/2020, Jefferies LLC via Secretary of State (after attempt) on 3/19/2020, Geode Capital Management LLC at Boston, MA on 3/16/2020, CSS LLC at Chicago, IL on 3/16/2020, AQR Capital Management LLC via Secretary of State (after attempt) on 3/20/2020	1.00	975.00	975.00

08/08/2022

Page 2 of 9

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Trans No	Matter ID	Client Sort	Matter	Date	Prof	Narrative	Units	Price	Value
1882417	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	03/03/2020		JPC, Working Meal, Frame, 2/23/2020	1.00	12.16	12.16
1887282	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	04/13/2020		Federal Express Corp., Inv # 6-984-18999, dated 4/13/20, delivered: 4/10/20. Sender: JPC / Recipient: Ms. Beata Gocyk-Farber, Esq., NY, NY	1.00	20.17	20.17
1887423	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	04/27/2020		Copies	109.00	0.20	21.80
1888521	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	04/09/2020		Executive Attorney Service Inc., Inv # 55105, Notary Fee and Service of Subpoena to Produce Documents etc upon Wells Fargo & CO Private Banking at Sacramento, CA on 4/2/2020	1.00	165.00	165.00
1888522	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	04/16/2020		Executive Attorney Service Inc., Inv # 55147, Service of Subpoena to Produce Documents etc upon Highland Capital Management LP at Dallas, TX on 4/15/2020	1.00	150.00	150.00
1888763	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	04/28/2020		Executive Attorney Service Inc., Inv # 55214, Service of Subpoena to Produce Documents etc upon Wells Fargo Securities LLC at Albany, NY on 4/24/2020 (multiple attempts)	1.00	200.00	200.00
1890068	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	04/30/2020		Uber, JPC, 3/5 & 3/17/2020	1.00	41.31	41.31
1891650	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	04/03/2020		JPC, Working Meal, 3/11/2020	1.00	19.49	19.49

08/08/2022

Page 3 of 9

Matter ID begins with 'N-1944.001' and Billed and costs and not hidden

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ba14Ch11-fraudulent conveyancelit

Trans No	Matter ID	Client Sort	Matter	Date	Prof	Narrative	Units	Price	Value
1892249	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	05/08/2020		Copies	30.00	0.20	6.00
1894874	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	05/15/2020		Danielle Marlow, Comerica fee for research & records	1.00	60.00	60.00
1902657	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	05/05/2020		Executive Attorney Service Inc., Inv # 55279, Service of Subpoena to Produce Documents etc upon: Deutsche Bank Private Banking & Investment Banking at New York, NY on 4/22/2020 (attempted), Legal & General Investment Management Limited at Chicago, IL on 4/22/2020 (multiple attempts), and Credit Suisse Securities (USA) LLC at Albany, NY on 4/29/2020 (multiple attempts)	1.00	625.00	625.00
1902659	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	05/06/2020		Executive Attorney Service Inc., Inv # 55284, Service of Subpoena to Produce Documents etc upon HSBC Global Asset Management UK Ltd at New York, NY on 5/4/2020	1.00	75.00	75.00
1903967	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	04/30/2020		TAB, Court Solutions, 4/23/2020	1.00	70.00	70.00
1903972	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	04/30/2020		JPC, Court Solutions, 4/23/2020	1.00	70.00	70.00
1916372	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	06/10/2020		Executive Attorney Service Inc., Inv # 55624, Service of Subpoena to Produce Documents etc upon Wells Fargo Securities LLC at Charlotte, NC on 6/8/2020	1.00	150.00	150.00

08/08/2022

Page 4 of 9

Matter ID begins with 'N-1944.001' and Billed and costs and not hidden

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ba14Ch11-fraudulent conveyancelit

Trans No	Matter ID	Client Sort	Matter	Date	Prof	Narrative	Units	Price	Value
1916384	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	06/05/2020		Executive Attorney Service Inc., Inv # 55586, Service of Subpoena to Produce Documents etc upon Deutsche Bank Securities Inc. at Albany, NY on 6/3/2020 (attempted), and via Secretary of State on 6/3/2020	1.00	175.00	175.00
1918579	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/14/2020		Copies	34.00	0.20	6.80
1919309	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/16/2020		Copies	11.00	0.20	2.20
1920716	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/20/2020		Copies	74.00	0.20	14.80
1921295	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/21/2020		Copies	17.00	0.20	3.40
1923389	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/27/2020		Copies	19.00	0.20	3.80
1924769	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/29/2020		Copies	113.00	0.20	22.60
1925748	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/17/2020		TD Ameritrade Inc, Inv # SOP-12924, Hours Production, Notary Fee	1.00	76.00	76.00

08/08/2022

Page 5 of 9

Matter ID begins with 'N-1944.001' and Billed and costs and not hidden

Moritt Hock & Hamroff LLP

Final - MHH Listing Wide

ba14Ch11-fraudulent conveyancelit

Trans No	Matter ID	Client Sort	Matter	Date	Prof	Narrative	Units	Price	Value
1931091	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	08/13/2020		Copies	111.00	0.20	22.20
1931915	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/23/2020		Executive Attorney Service Inc. Inv # 56455, Attempted Service at Address Given - Moved out, Attempted Service in NJ upon RBC Dominion Securities Inc at 30 Hudson Street, Jersey City, NJ	1.00	300.00	300.00
1931925	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/07/2020		Executive Attorney Service Inc.	1.00	125.00	125.00
1931935	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/07/2020		Executive Attorney Service Inc. Inv # 56106, Process Service, upon National Financial Services LLC at CT Corp, 28 Liberty Street, 42nd Floor, New York, NY	1.00	75.00	75.00
1931940	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/13/2020		Executive Attorney Service Inc. Inv # 56154, Process Service upon JP Morgan Chase Bank at CT Corp, 28 Liberty Street, 42nd Floor, New York, NY	1.00	75.00	75.00
1931950	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/13/2020		Executive Attorney Service Inc. Inv # 56155, Process Service via Secretary of State, Disbursement for Secretary of State Fee, upon BMO Nesbitt Burns Corp at 99 Washington Ave, 6th Floord, Albany, NY 12231	1.00	100.00	100.00
1931955	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/13/2020		Executive Attorney Service Inc. Inv # 56156, Out of State Process Service and California Notary, upon SSB - Blackrock Institutional Trust at 400 Howard Street, San Francisco, CA 94105	1.00	165.00	165.00
1931957	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/13/2020		Executive Attorney Service Inc. Inv # 56156, Out of State Process Service, upon USAA Investment Management Company at 9800 Fredericksburg Road, San Antonio, TX 78288	1.00	150.00	150.00

08/08/2022

Page 6 of 9

Matter ID begins with 'N-1944.001' and Billed and costs and not hidden

Moritt Hock & Hamroff LLP

Final - MHH Listing Wide

ba14Ch11-fraudulent conveyancelit

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1931959	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/13/2020		Executive Attorney Service Inc. Inv # 56156, Process Service, upon TD Prime Services LLC at CSC, 80 Street, Albany, NY 12207	1.00	100.00	100.00
1931967	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/13/2020		Executive Attorney Service Inc. Inv # 56156, Out of State Process Service, upon UMB Bank N.A at 1010 Grand Blvd, 3rd Floor, Kansas City, MO 64106	1.00	150.00	150.00
1931972	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/13/2020		Executive Attorney Service Inc. Inv # 56156, Process Service, upon RBC Capital Markets, LLC at CSC, 80 State Street, Albany, NY 12207	1.00	100.00	100.00
1931981	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/15/2020		Executive Attorney Service Inc. Inv # 56304, Process Service, upon BoFA Securities, Inc. at CT Corp, 28 Liberty Street, 42nd Floor, New York, NY	1.00	1,690.00	1,690.00
1932001	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	07/20/2020		Executive Attorney Service Inc. Inv # 56358, Process Service, upon PNC Bank N.A at 11 penn Plaza, New York, NY 10001	1.00	75.00	75.00
1932483	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	08/17/2020		Copies	11.00	0.20	2.20
1933713	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	08/19/2020		Copies	11.00	0.20	2.20
1944552	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	09/15/2020		Copies	166.00	0.20	37.20

08/08/2022

Page 7 of 9

Matter ID begins with 'N-1944.001' and Billed and costs and not hidden

Moritt Hock & Hamroff LLP

Final - MHH Listing Wide

ba14Ch11-fraudulent conveyancelit

Trans No	Matter ID	Client Sort	Matter	Date	Prof	Narrative	Units	Price	Value
1952977	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	10/05/2020		Copies	62.00	0.20	12.40
1954371	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	09/24/2020		Executive Attorney Service Inc., Inv # 58024, Out of State Process Service, upon Legal & General Investment Management America, at Chicago IL, on 9/15/2020	1.00	150.00	150.00
1956288	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	10/13/2020		Copies	32.00	0.20	6.40
1956736	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	10/14/2020		Copies	32.00	0.20	6.40
1957560	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	10/16/2020		Copies	11.00	0.20	2.20
1962697	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	10/12/2020		Federal Express Corp., Inv # 7-147-27326, dated 10/12/20, delivered: 10/8/20. Sender: DJM / Recipient: General Counsel, BMO Nesbitt Burns Corp., NY, NY	1.00	20.41	20.41
1966098	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	10/31/2020		CourtSolutions, DJM, 10/6/2020	1.00	70.00	70.00
1968172	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	10/31/2020		CourtSolutions, Hearing, JPC, 10/6 & 10/15/2020	1.00	140.00	140.00

08/08/2022

Page 8 of 9

Matter ID begins with 'N-1944.001' and Billed and costs and not hidden

Moritt Hock & Hamroff LLP
Final - MHH Listing Wide

ba14Ch11-fraudulent conveyancellit

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1968174	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	10/31/2020		CourtSolutions, Hearing, TAB, 10/15/2020	1.00	70.00	70.00
1978218	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	11/30/2020		Uber, JPC, 10/14/2020	1.00	15.88	15.88
1981587	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	12/11/2020		Copies	36.00	0.20	7.20
1997914	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	01/22/2021		US Bank National Association, Research and production of Subpoena (Sears Holding)	1.00	200.00	200.00
2016597	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	02/28/2021		Court Solutions, TAD, 2/23/21	1.00	70.00	70.00
2100631	N-1944.001	Akin Gump Straus Hauer & Feld LLP	Investigation and Potential Adversary Proceedings against Public	09/07/2021		Copies	37.00	0.20	7.40
Grand Total:							<u>1,318. 00</u>		<u>12,031.22</u>

08/08/2022

Page 9 of 9

Matter ID begins with 'N-1944.001' and Billed and costs and not hidden